

Exhibit B
Deposition of LaRonda Hunter

LA RONDA HUNTER

12/16/08

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

LaRONDA HUNTER, ROSANA N.
PULGARIN, and ROBIN GONZALES,
on behalf of themselves and
on behalf of all others
similarly situated and the
general public,

Plaintiffs,

vs. No. BC324622

GENERAL MOTORS CORPORATION and
DOES 1 through 100,
Defendants.

DEPOSITION OF LA RONDA HUNTER
Los Angeles, California
Tuesday, December 16, 2008

Reported by:
DENISE BARDSLEY
CSR No. 11241
JOB No. 101996

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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 COUNTY OF LOS ANGELES
3
4 LaRONDA HUNTER, ROSANA N.
PULGARIN, and ROBIN GONZALES,
5 on behalf of themselves and
on behalf of all others
6 similarly situated and the
general public,
7
8 Plaintiffs,
9
10 vs. No. BC324622
11
12 GENERAL MOTORS CORPORATION and
DOES 1 through 100,
13 Defendants.
14
15
16 Deposition of LA RONDA HUNTER, taken on behalf of
17 Defendant General Motors Corporation, at 777 South
18 Figueroa Street, Los Angeles, California, beginning at
19 10:10 a.m. and ending at 3:25 p.m. on Tuesday,
20 December 16, 2008, before DENISE BARDSLEY, Certified
21 Shorthand Reporter No. 11241.
22
23
24
25

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1 LA RONDA HUNTER,
2 having been first placed under oath, was examined and
3 testified as follows:
4
5 THE VIDEOGRAPHER: You may proceed.
6
7 EXAMINATION
8 BY MS. GUZMAN:
9 Q Good morning, Ms. Hunter. I am Kelly Guzman,
10 and I represent General Motors.
11 Would you please state your name for the
12 record.
13 A My name is La Ronda Hunter.
14 Q And I would like to go through a few basic
15 rules for the procedure, ground rules, and then give
16 you a chance to ask any questions you have about how
17 this is going to go.
18 First of all, you understand that you're
19 under oath, correct?
10:11 20 A Yes.
21 Q And that means that you must answer all of
22 the questions I ask you truthfully and honestly and to
23 the best of your ability.
24 A Yes.
25 Q You must also answer the questions audibly so

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1 Los Angeles, California, Tuesday, December 16, 2008
2 10:10 a.m. - 3:25 p.m.
3
4 THE VIDEOGRAPHER: Good morning, today is
5 December 16, 2008. We are on the record at 10 past
6 10:00. We're here for the deposition of La Ronda
7 Hunter in the matter of Hunter, et al., versus General
8 Motors, Case Number BC324622, pending before Superior
9 Court, State of California, County of Los Angeles.
10:09 10 This deposition is being taken on behalf of
11 the Defendant. We are at the offices of Krikland &
12 Ellis, located at 777 South Figueroa Street, Los
13 Angeles, California.
14 My name is Bruno Sere, appearing on behalf of
15 Sarnoff Court Reporters and Legal Technologies located
16 in Los Angeles, California.
17 Would counsel please introduce themselves and
18 state their affiliation.
19 MS. GUZMAN: Kelly Guzman, counsel for GM.
10:10 20 MS. YASHAR: Pantea Yashar counsel for GM.
21 MR. SPIRO: Ira Spiro, S-p-i-r-o, counsel for
22 plaintiff.
23 THE VIDEOGRAPHER: You may swear in the
24 witness.
25

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1 that the court reporter can take them down.
2 A Yes.
3 Q It's difficult for her to transcribe a nod of
4 the head or an uh-huh, so anytime you can, please
5 answer a clear yes or no.
6 For the purposes of this deposition, when I
7 refer to GM, I mean General Motors Corporation and all
8 of its divisions, affiliates, et cetera. Okay?
9 A Okay.
10:11 10 Q Please tell me if you do not understand a
11 question that I ask you. Okay?
12 A Okay.
13 Q If you answer, I will assume that you
14 understood the question. Is that fair?
15 A Yes.
16 Q We're going to take a break every hour and
17 for lunch. Is that all right?
18 A Yes.
19 Q And if you need a break, that's fine, just
10:11 20 let me know. I just ask that if there is a question
21 pending, you finish answering it before we take a
22 break. Is that okay?
23 A Yes.
24 Q Are you taking any medication or are you
25 under the influence of alcohol or any drugs today?

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2 (Pages 5 to 8)

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1 MR. SPIRO: Don't answer quite yet. Any
2 medication, Counsel? There is a right to privacy
3 there.
4 Any medication that would affect her
5 testimony would be okay. I'll let her answer that.
6 BY MS. GUZMAN:
7 Q Okay. Are you taking any medication that
8 affects your ability to testify today?
9 A No.
10:12 10 Q Are you under the influence of alcohol or any
11 drugs today?
12 A No.
13 Q Is there any other reason at all that your
14 memory might be impaired or you might be unable to
15 understand my questions today?
16 A No.
17 Q Finally, please understand that all we are
18 interested in here is your truthful, honest testimony.
19 Okay?
10:12 20 A Okay.
21 Q Now, do you have any questions about this or
22 the basic format of the deposition?
23 A No.
24 Q Ms. Hunter, what is your age?
25 A 39.

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1 A One.
2 Q How old is your child?
3 A 18 years old.
4 Q Does anyone depend on you for support?
5 A My daughter.
6 Q Anyone else?
7 A No.
8 Q Who lives in your household now?
9 A Me and my daughter and my sister.
10:14 10 Q Has anyone else lived in your household in
11 the past?
12 A No. In the past, as far as the new address,
13 no.
14 Q Are you currently employed?
15 A I'm retired.
16 Q Where did you work?
17 A United States Postal Service.
18 Q And how long did you work there?
19 A 14 years. Approximately 14 years.
10:14 20 Q What was your position at the United States
21 Postal Service?
22 A Equipment operator.
23 Q How long did you hold that position?
24 A About two years.
25 Q Who was your supervisor at that position?

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1 Q What is your date of birth?
2 A 03/26/1969.
3 Q Where were you born?
4 A California.
5 Q Where in California?
6 A Los Angeles.
7 Q Where do you live?
8 A In Los Angeles, California.
9 Q Can you give me your address?
10:13 10 A 4125 Marine Ave.
11 Q How long have you lived at that address?
12 A Two years.
13 Q Where did you live before then?
14 A 15014 Eastwood.
15 Q Also in Los Angeles?
16 A In Lawndale.
17 Q In Lawndale?
18 A Uh-huh, yes.
19 Q How long did you live at that address?
10:13 20 A About 14 years, 15 -- 14, 15 years.
21 Q Are you married?
22 A No.
23 Q Do you have any children?
24 A Yes.
25 Q How many?

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1 A Estban Goitia.
2 Q Could you spell that name.
3 A E-s-t-b-a-n G-o-i-t-i-a.
4 Q And what were your duties and
5 responsibilities at that position?
6 A Duties of an equipment operator is to operate
7 a forklift.
8 Q What did you do before you were equipment
9 operator?
10:15 10 A Mail handler.
11 Q How long were you at that position?
12 A Twelve.
13 Q And who was your supervisor at that position?
14 A It varied.
15 Q Just to clarify, you mean 12 years?
16 A Uh-huh, yes.
17 Q Can you remember any of your supervisor's
18 names at that position?
19 A Girtha Hollman, G-i-r-t-h-a, H-o-l-l-m-a-n.
10:15 20 Q Any others?
21 A Glenn Hooks.
22 Q Any others?
23 A No.
24 Q What were your duties and responsibilities at
25 that position?

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3 (Pages 9 to 12)

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1 A To process mail.
2 Q How long were you at the United States Postal
3 Service total?
4 A From 1994 to 2008.
5 Q Do you have a high school diploma?
6 A Yes.
7 Q And do you have a college degree?
8 A Yes, associate.
9 Q Is that a two-year associate's degree?
10:16 10 A Yes.
11 Q What is it in?
12 A Computers.
13 Q Can you be any more specific than that?
14 A Information technology.
15 Q Have you been -- do you consider yourself an
16 expert in anything?
17 A No.
18 Q Do you have any training or experience in
19 engineering?
10:17 20 MR. SPIRO: Counsel, excuse me, I should have
21 objected to the question about expert as vague, calls
22 for a legal conclusion, so I move to strike the
23 answer.
24 MS. GUZMAN: Okay. Your objection's noted.
25 I'm going to still ask the question.

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1 Q Do you consider yourself an expert in
2 anything?
3 A No.
4 Q Do you have any training or experience in
5 engineering?
6 A No.
7 Q Do you have any training or experience in
8 automotive repair or work?
9 A No.
10:17 10 Q Do you have any training or experience in
11 automotive sales, leasing, rental?
12 A No.
13 Q Do you have any training or experience at all
14 in the automotive industry?
15 A No.
16 Q Do you have any training or experience in
17 insurance?
18 A No.
19 Q Do you have any training or experience in
10:17 20 advertising?
21 A No.
22 Q Do you have any training or experience in
23 drafting warranties?
24 A No.
25 Q Do you know what discovery is?

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1 A Yes.
2 Q Are you aware that there has already been
3 discovery in this case?
4 A Yes.
5 Q You're aware that you have served discovery
6 requests and GM has served discovery requests?
7 A Yes.
8 Q And are you aware that GM has served document
9 requests and interrogatories about you?
10:18 10 A Yes.
11 Q Who told you this?
12 A My attorney.
13 MR. SPIRO: Move to strike, attorney-client.
14 So if your answers -- if the question -- if
15 your answers to the question, La Ronda, would require
16 you to say something about communications between you
17 and your lawyers, then say so, and you don't have to
18 answer that.
19 THE WITNESS: Okay.
10:18 20 BY MS. GUZMAN:
21 Q Are you aware that you have provided written
22 responses to GM's document requests and
23 interrogatories?
24 A Yes.
25 Q Did you draft these responses?

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1 MR. SPIRO: Vague.
2 THE WITNESS: Vague.
3 BY MS. GUZMAN:
4 Q Did you draft the responses that you
5 submitted to GM's document requests and
6 interrogatories?
7 MR. SPIRO: Vague and compound, actually.
8 BY MS. GUZMAN:
9 Q Ms. Hunter, did you draft your responses to
10:19 10 GM's document requests?
11 MR. SPIRO: Vague and compound -- yeah,
12 vague.
13 BY MS. GUZMAN:
14 Q You can answer.
15 MR. SPIRO: If you know.
16 THE WITNESS: You said that I did what?
17 BY MS. GUZMAN:
18 Q Did you draft your answers to GM's document
19 request?
10:19 20 A That's attorney-client privilege.
21 MR. SPIRO: Counsel, the problem is the word
22 "draft."
23 BY MS. GUZMAN:
24 Q Did you write the answers to GM's document
25 requests?

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1 MR. SPIRO: Still vague.
2 THE WITNESS: Privileged.
3 BY MS. GUZMAN:
4 Q Did you see your responses to GM's document
5 requests?
6 A Yes.
7 Q Ms. Hunter, what is your answer to my
8 question, "Did you draft the written responses to GM's
9 document requests?"
10:20 10 MR. SPIRO: Vague.
11 It is asked and answered -- asked and
12 responded to three times. The question is vague, it's
13 also compound. It's not a fair question.
14 BY MS. GUZMAN:
15 Q Do you need me to ask the question again or
16 can you answer?
17 A I'm not going to answer.
18 Q Why not?
19 A Because the same -- because I've already
10:20 20 answered once. You asked me three times.
21 Q What is your answer?
22 MR. SPIRO: No, she's -- what do you mean
23 what is her answer? She's already answered three
24 times.
25 MS. GUZMAN: Are you instructing her not to
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1 answer?
2 MR. SPIRO: No, I'm objecting. I don't know
3 what your question is. She's answered three times.
4 Which one are you talking about?
5 MS. GUZMAN: I would like her clear answer as
6 to whether she's drafted the written responses to GM's
7 document request.
8 MR. SPIRO: That's impossible for --
9 MS. GUZMAN: That's a yes-or-no answer.
10:21 10 MR. SPIRO: No, it isn't, because I don't
11 know what you mean by the word "draft" and neither
12 does she.
13 BY MS. GUZMAN:
14 Q Mrs. Hunter, what do you think I mean by the
15 word "draft"?
16 A You have to explain it.
17 Q By "draft," I mean write. Did you write the
18 responses --
19 MR. SPIRO: It is still unclear. You mean
10:21 20 with her own hand or what?
21 BY MS. GUZMAN:
22 Q Yes, I mean with your own hand. Did you
23 write with your own hand the responses to GM's
24 document requests?
25 A I did not write any answers. The answers
Page 18

1 are -- actually are typed.
2 Q Do you know who did?
3 A No, I don't.
4 Q You do not know who wrote the responses to
5 GM's document requests?
6 MR. SPIRO: She answered that. Don't harass
7 the witness. She answered your question. She said
8 no.
9 MS. GUZMAN: Make your objection, if you
10:21 10 would like, but I would still like an answer to the
11 question.
12 MR. SPIRO: No, she's not going to answer it
13 twice. She answered.
14 MS. GUZMAN: Are you instructing her not to
15 answer the question?
16 MR. SPIRO: Yes, yes --
17 THE REPORTER: I can only get one person.
18 This won't be on the record.
19 MS. GUZMAN: Are you instructing the witness
10:22 20 not to answer.
21 MR. SPIRO: Yes, because you're harassing.
22 (Instruction not to answer.)
23 BY MS. GUZMAN:
24 Q Ms. Hunter, did you type the responses to
25 GM's interrogatories?
Page 19

1 A No.
2 Q Do you know who did?
3 A No.
4 Q Did you see the responses to GM's document
5 requests?
6 A Which document request? Are you talking
7 about the discovery?
8 Q Yes, the document requests about you.
9 A Yes, I see -- yes, I saw them.
10:22 10 Q Who showed those to you?
11 A My attorney.
12 Q When did you see them?
13 A When they were first produced.
14 Q Did you review those written responses and
15 check to see that they were accurate?
16 A Yes.
17 Q Did you edit or correct anything in them?
18 A I --
19 MR. SPIRO: Vague -- vague and compound.
10:23 20 THE WITNESS: How could I edit and correct
21 something when they were typed?
22 BY MS. GUZMAN:
23 Q Did you ask your attorney to change anything
24 in those responses before they were submitted?
25 MR. SPIRO: Attorney-client.
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5 (Pages 17 to 20)

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<p>1 Don't answer. 2 (Instruction not to answer.) 3 BY MS. GUZMAN: 4 Q Did you see the responses to GM's 5 interrogatories? 6 A To me, yes. 7 Q When did you see those? 8 A When they were first produced. 9 Q Did you review the responses to GM's 10:23 10 interrogatories and check to see that they were 11 accurate? 12 A Yes. 13 Q Did you authorize your attorney to file those 14 responses to interrogatories? 15 MR. SPIRO: Attorney-client. 16 Don't answer. 17 (Instruction not to answer.) 18 BY MS. GUZMAN: 19 Q Do you think that -- I'm sorry, strike that. 10:24 20 As a class representative, do you think that 21 you have an obligation to review interrogatory 22 responses to make sure they are accurate before they 23 are filed with the court? 24 MR. SPIRO: Compound, calls for a legal 25 conclusion.</p> <p>Page 21</p>	<p>1 MR. SPIRO: Vague. 2 BY MS. GUZMAN: 3 Q Have you seen it before? 4 A Yes.. 5 Q What is this? 6 A Plaintiff La Ronda Hunter Responses to Form 7 Interrogatories Set One. 8 Q Did you review this form interrogatory 9 response completely before you authorized your 10:26 10 attorney to submit it? 11 A Yes. 12 Q And can you verify that the answers in this 13 form interrogatory are complete and correct? 14 MR. SPIRO: Compound, vague as to the word 15 "verify." And it is grossly compound. 16 Go ahead. You can answer, if you can. 17 BY MS. GUZMAN: 18 Q Ms. Hunter, can you turn to the third-to-the- 19 last page of this document. Is this your signature 10:26 20 that appears on this page -- oh, I'm sorry, you're not 21 there yet. 22 Is this your signature that appears on this 23 page? 24 A Yes. 25 Q Did you sign the statement verifying that</p> <p>Page 23</p>
<p>1 Go ahead. 2 They are not filed with the court, Counsel. 3 That's misleading the witness. 4 MS. GUZMAN: I'll rephrase. 5 Q As a class representative, do you think that 6 you have an obligation to review interrogatory 7 responses to make sure that they are accurate before 8 they are submitted in litigation? 9 A Yes. 10:24 10 MR. SPIRO: That's compound. 11 Go ahead -- okay. 12 BY MS. GUZMAN: 13 Q Ms. Hunter, I'm handing you your responses to 14 GRM's form interrogatories, which will be marked as 15 Deposition -- sorry, Defendants' Exhibit 1. 16 (Deposition Exhibit 1 marked.) 17 BY MS. GUZMAN: 18 Q Do you recognize this document? 19 A Yes, I do. 10:25 20 Q How do you recognize it? 21 MR. SPIRO: Vague. 22 BY MS. GUZMAN: 23 Q How do you recognize it, Ms. Hunter? 24 A It is sitting in front of me. 25 Q How do you know what it is?</p> <p>Page 22</p>	<p>1 your answers are true and correct? 2 A Yes. 3 Q And are the responses contained in your 4 responses to GM's form interrogatories still complete 5 and correct? 6 A Yes. 7 MR. SPIRO: I move to strike. It misstated 8 the verification and her previous testimony. She 9 didn't say anything about complete, nor does the 10:27 10 verification. 11 BY MS. GUZMAN: 12 Q Ms. Hunter, are your answers to these form 13 interrogatories complete? 14 A Yes. 15 MR. SPIRO: Move to strike. The question was 16 compound, extremely. 17 BY MS. GUZMAN: 18 Q Ms. Hunter, I'm going to hand you another 19 document marked as Deposition Exhibit 2. 10:28 20 (Deposition Exhibit 2 marked.) 21 BY MS. GUZMAN: 22 Q Do you recognize this document? 23 A Yes, I do. 24 Q What is it? 25 A La Ronda Hunter responses to defendant first</p> <p>Page 24</p>

6 (Pages 21 to 24)

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1 set of interrogatories, set one.
2 Q Is this a true and accurate copy of your
3 responses?
4 MR. SPIRO: Do you want -- how would she
5 know?
6 MS. GUZMAN: Well, she can review it.
7 MR. SPIRO: Okay. Review it page by page,
8 then, if you need to. As much as you need to do to
9 answer this question, or maybe we can stipulate to
10:28 10 that once I look at it.
11 I think these are not complete. The third-
12 to-the-last page, I guess, or fourth-to-the-last says
13 pages 7 of 8. Now, maybe these are configured wrong,
14 but it gives me some reason to think they are not. I
15 could check my own and see.
16 My own copy has the same, 7 of 8.
17 Do you want me to say anything about whether
18 they are complete?
19 MS. GUZMAN: Only if you need to for your
10:31 20 client to answer.
21 THE WITNESS: I hope you wouldn't give me any
22 incomplete documents.
23 BY MS. GUZMAN:
24 Q Is there any reason you think this is not a
25 true and accurate copy of your responses to

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1 defendants' first set of interrogatories?
2 A No.
3 Q Did you review these responses completely
4 before you authorized your attorney to submit them?
5 A Yes, I verified my responses.
6 Q I'm sorry, Ms. Hunter, my question was
7 slightly different. It was did you review these
8 responses before you authorized your attorney to file
9 them -- or, sorry, to submit them?
10:31 10 A Did I review them?
11 Q Did you review them, did you read them?
12 A What do you mean by -- yes, I read them.
13 Q I'm going to ask you again to turn to the
14 third-to-the-last page. Is that your signature on
15 this page?
16 A Yes.
17 Q And did you verify that the responses are
18 true?
19 A Yes, I did.
10:32 20 Q Are these responses still accurate?
21 MR. SPIRO: Compound.
22 BY MS. GUZMAN:
23 Q Ms. Hunter, can you tell me whether the
24 responses are still accurate?
25 MR. SPIRO: Compound.

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1 BY MS. GUZMAN:
2 Q You can answer.
3 A Can I tell you the answers accurate? They
4 are the same answers that I gave, They are the exact
5 same answers.
6 Q So they are still true?
7 A Yes.
8 Q And are these responses still complete?
9 A Yes.
10:32 10 MR. SPIRO: Compound, facts not in evidence.
11 BY MS. GUZMAN:
12 Q I'm sorry, your answer was "Yes"?
13 A (No audible response.)
14 Q Ms. Hunter, I'm handing you a copy of your
15 responses to defendants' request for production. It
16 is being marked as Deposition Exhibit Number 3.
17 (Deposition Exhibit 3 marked.)
18 BY MS. GUZMAN:
19 Q Do you recognize this document?
10:33 20 A Yes.
21 Q What is it?
22 A Plaintiff's La Ronda Hunter's responses to
23 defendant first set of request of production of
24 documents.
25 Q Is this a true and accurate copy of your

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1 discovery responses?
2 A Yes.
3 Q Did you review these responses completely
4 before you authorized your attorney to submit them?
5 A Yes.
6 Q Did you sign the verification page at the
7 end?
8 A Yes.
9 Q Did you verify that your answers are true?
10:34 10 A Yes, I did. I reviewed them, read them,
11 signed the verification and turned them over.
12 Q Are your responses still complete?
13 MR. SPIRO: Vague, compound.
14 THE WITNESS: Vague, compound.
15 BY MS. GUZMAN:
16 Q I need you to still answer my question,
17 Ms. Hunter.
18 A You said --
19 Q Are the responses contained in this document
10:34 20 still complete?
21 A The answers are the same. They are the same
22 as it was when I submitted them 8/27/28 -- 2008.
23 Q When you submitted them on 8/27/2008, were
24 they complete answers to the questions?
25 A Yes.

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7 (Pages 25 to 28)

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1 Q And they still are?
2 A Yes.
3 Q Ms. Hunter, can you tell me the make, model
4 and year of your vehicle?
5 A GMC Yukon, 2001.
6 Q Do you know the vehicle identification
7 number?
8 A No.
9 Q I'm going to refer you to your response to
10:35 10 interrogatory number 1.
11 MR. SPIRO: Which set?
12 MS. GUZMAN: The regular interrogatories, not
13 the form interrogatories.
14 MR. SPIRO: Exhibit 2?
15 MS. GUZMAN: Yes.
16 MR. SPIRO: That's 2.
17 THE WITNESS: My arm hurt. I can barely put
18 my coat on, on the arm.
19 BY MS. GUZMAN:
10:35 20 Q On page 5 of this document, your response to
21 interrogatory number 1, you state that your vehicle
22 identification number is 1GKEC13T71J201855.
23 Is that correct?
24 A Yes.
25 Q Are you the registered owner of your vehicle?
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1 A Yes.
2 Q Are you the principal driver of the 2001 GMC
3 Yukon?
4 A Yes.
5 Q Does anyone other than you drive the vehicle?
6 A No.
7 Q What purpose do you use the car for, mainly?
8 A Before I retired, I was using it to go back
9 and forth to work.
10:36 10 Q Now what do you use it for?
11 A It's sitting in the driveway because the
12 parking brake is to the floor and it's --
13 Q So you don't use it for anything now?
14 A (No audible response.)
15 Q You still own the 2001 Yukon?
16 A Yes.
17 Q How did you come to purchase your 2001 Yukon?
18 A How did I come to purchase it?
19 Q Uh-huh.
10:37 20 A I needed a new car and I went and looked for
21 one. I seen it and I liked it.
22 Q Where did you see it?
23 A Justice Auto.
24 Q What's that?
25 A Justice Auto.
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1 Q Is that a dealership?
2 A They were working with the postal employees,
3 so, no, it is not, actually, a dealership.
4 Q Did you buy it through work?
5 A Yes.
6 Q Can you explain to me how that works?
7 A They teamed up with postal credit union
8 and --
9 Q Who teamed up with --
10:37 10 A Justice Auto.
11 Q Justice Auto teamed up with the postal credit
12 union?
13 A Uh-huh.
14 Q And they make vehicles available for purchase
15 by the employees --
16 A Yes.
17 Q -- of --
18 Do they give any special deals on the cars?
19 A No, not that I know of, no.
10:38 20 Q So how did you buy the car? Did you go to a
21 dealership or did you order it somehow?
22 A I knew that I wanted a Yukon, a GMC Yukon, so
23 I basically told them what I wanted and they went and
24 found it and they brought it back.
25 Q Who did you tell what you wanted?
Page 31

1 A Justice Auto.
2 Q And when you say they went and found it and
3 brought it back, what do you mean?
4 A They went -- I told them I wanted a white GMC
5 Yukon, and they went and got a white GMC Yukon and let
6 me look at it. And they said, "Is this what you
7 want?" I said "Yes," and I purchased it.
8 Q Where did they bring it?
9 A To Justice Auto.
10:38 10 Q Where is Justice Auto located?
11 A In Carson, California.
12 Q I'm sorry, just for the sake of the court
13 reporter, let me finish my question and then give your
14 answer and I'll do the same and not interrupt you so
15 she can take us both down separately.
16 Where is Justice Auto located?
17 A Carson, California.
18 Q Thank you.
19 Did you buy the car new?
10:39 20 A It was a demo and it had 1,800 miles on it.
21 Q What do you mean it was a demo?
22 A It was -- it was -- one of those cars that
23 you show.
24 Q That Justice Auto showed?
25 A I don't have no idea. I know it was a demo.
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8 (Pages 29 to 32)

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1 Q How do you know it was a demo?
2 A Because they told me.
3 Q Justice Auto told you it was a demo?
4 A Yes.
5 Q Did they explain what they meant by that?
6 A No, they didn't have to explain a demo. A
7 demo is something that a dealership demo, a floor
8 demo.
9 Q Ms. Hunter, when did you buy this car?
10:40 10 A When did I buy the car? In 2002.
11 Q Do you know when in 2002?
12 A January -- or January of 2002 or 2001. I
13 don't know. I don't know the exact year.
14 Q And you bought it at Justice Auto?
15 A Yes.
16 Q Was it a lease or a purchase?
17 A Purchase.
18 Q What was the purchase price?
19 A 33,000.
10:41 20 Q How was it financed?
21 A Through Priority One Credit Union.
22 Q Did you have monthly payments on the car
23 after that?
24 A Yes.
25 Q For how many years?

Page 33

1 BY MS. GUZMAN:
2 Q As far as you know --
3 MR. SPIRO: Objection, not a motion to
4 strike. Sorry.
5 BY MS. GUZMAN:
6 Q Do you need me to repeat the question,
7 Ms. Hunter?
8 A What is it?
9 Q As far as you know, the price of your car was
10:43 10 unconnected to the fact that it was a demo?
11 A I don't know. I can't -- I don't know.
12 Q Okay. Do you know the relationship between
13 Justice Auto and GM?
14 A No.
15 Q How did you know that you wanted a 2001 GMC
16 Yukon?
17 A Because I seen it and I liked it.
18 Q Where did you first see it?
19 A On TV.
10:43 20 Q When was that?
21 A When they first came out.
22 Q Can you give me that date?
23 A I don't know the exact date they first came
24 out.
25 Q Do you know the month?

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1 A Five.
2 Q Do you remember what your monthly payments
3 were?
4 A Yes.
5 Q How much was your monthly payment?
6 A 579, or something like that. 579. It might
7 have been six years.
8 Q What is the car's mileage today?
9 A 91,000 miles.
10:42 10 Q Have you been in any accidents with your 2001
11 Yukon?
12 A No.
13 Q Did you get a special deal because your car
14 was a demo?
15 A No, I don't know.
16 Q You don't know whether you got a different
17 price because your car was a demo?
18 MR. SPIRO: That's vague.
19 THE WITNESS: They told me the price of the
10:42 20 car, and that's what I purchased it for.
21 BY MS. GUZMAN:
22 Q So as far as you know, the price of the car
23 was unconnected to the fact that it was a demo?
24 MR. SPIRO: Move to strike. Mischaracterized
25 her testimony. It is also vague.

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1 A I don't -- I don't know.
2 Q Do you know the year?
3 A It was 2000 -- 2000 when I first seen them.
4 Q After you saw it on the TV advertisement,
5 where did you next see it?
6 A Where did I next -- on the road.
7 Q What do you mean by "on the road"? Other
8 people driving?
9 A Yes.
10:44 10 Q Did you consider any other cars than the 2001
11 Yukon?
12 A No.
13 Q When you went to purchase the 2001 Yukon,
14 what did you know about it?
15 A Nothing. I just knew it was a car, you can
16 drive it.
17 Q Did you do any research or investigation on
18 the 2001 Yukon before you purchased it?
19 A No.
10:45 20 Q What did you see or hear about this
21 particular model on the TV?
22 A Actually, I didn't hear anything. I just
23 seen it and I liked it.
24 Q What did you like about it?
25 A Spacious.

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9 (Pages 33 to 36)

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1 Q Anything else?
2 A No.
3 Q Other than that TV advertisement, had you
4 seen any other advertisements before buying your 2001
5 Yukon?
6 A No.
7 Q And the TV advertisement you saw was for the
8 2001 Yukon specifically?
9 A No. It was a GM advertisement of all the
10:46 10 trucks.
11 Q Did you hear any statements about the car
12 during that advertisement?
13 A No.
14 Q What were your primary considerations in
15 purchasing your Yukon?
16 A Primary considerations, like what? What are
17 you talking about? What do you mean by "primary
18 considerations"?
19 Q What were the main reasons you bought the
10:47 20 2001 Yukon?
21 A Spacious.
22 Q Did the price matter to you?
23 A Of course it did. I can't buy something I
24 can't afford.
25 Q Well, what other than its spaciousness and
Page 37

1 its price mattered to you?
2 A I just like the car and I purchased it, and I
3 know I could afford it.
4 MS. GUZMAN: Ms. Hunter, I'm handing you a
5 copy of the fourth amended complaint. It is being
6 marked as Exhibit 4.
7 (Deposition Exhibit 4 marked.)
8 BY MS. GUZMAN:
9 Q Do you recognize this document?
10:48 10 A Yes.
11 Q What is it?
12 A Fourth Amended Complaint for Violation of
13 California's Consumer Legal Remedies Act, CLRA, and
14 Violation of California's Unfair Competition Act.
15 THE REPORTER: Make sure your coat isn't on
16 the microphone. Thank you.
17 MR. SPIRO: Do you want to put it on, the
18 coat?
19 THE WITNESS: I'm going to be hot. I forgot
10:49 20 to bring the sleeve thing.
21 BY MS. GUZMAN:
22 Q Ms. Hunter, did you review this fourth
23 amended complaint before you authorized your attorney
24 to file it?
25 A Yes.
Page 38

1 Q When you reviewed it, did you make sure
2 everything in it was true and correct?
3 A Yes.
4 Q In paragraph 58 you state, "At all times
5 relevant, and for many years prior, GM widely
6 disseminated in its nationally advertising campaign
7 numerous and repeated representations stressing the
8 quality, safety and performance of their products,
9 including the subject vehicles. During the class
10:50 10 period GM made the following representations in its
11 advertising by television, radio, print and Internet."
12 MR. SPIRO: Counsel, could you tell us what
13 page that's on?
14 MS. GUZMAN: Page 24, paragraph 58.
15 THE WITNESS: Because I don't know what 58
16 is.
17 MR. SPIRO: Paragraph 58, apparently it
18 starts at page 24. There it is. Page 24, starts at
19 line -- well, between lines 18 and 19.
10:51 20 THE WITNESS: I'm looking and going to 28.
21 BY MS. GUZMAN:
22 Q I'll repeat the beginning of my question.
23 In paragraph 58 you state, "At all times
24 relevant, and for many years prior, GM widely
25 disseminated in its national advertising campaign
Page 39

1 numerous and repeated representations stressing the
2 quality, safety and performance of their products,
3 including the subject vehicles. During the class
4 period GM made the following representations in its
5 advertising by television, radio, print and Internet."
6 Can you tell me where you saw or heard each
7 of the statements listed after that in the bullet
8 points?
9 MR. SPIRO: Compound.
10:52 10 BY MS. GUZMAN:
11 Q I'll rephrase, Ms. Hunter. Let's take the
12 first statement by the bullet point that says
13 "Professional Brake Engineering."
14 Do you see where I am?
15 A Yeah.
16 Q Did you ever personally see or hear that
17 statement?
18 A I'm quite sure I did.
19 Q Do you know when?
10:52 20 A If had to be in 2000 during the commercials.
21 Q Can you be any more specific than 2000?
22 A No, I can't.
23 Q On what occasion did you hear this statement?
24 A I don't know. I don't know.
25 Q Was it a television, radio, print or Internet
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10 (Pages 37 to 40)

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1 ad?
2 A I stated before I seen it on TV.
3 Q Where were you when you saw the statement on
4 TV?
5 A Home.
6 Q Let's take the next statement. "We are
7 professional grade - it's not a promotion, it's a
8 promise."
9 Did you personally hear or see this
10:53 10 statement?
11 A As stated, the answer is the same as the
12 answer I gave before.
13 Q Ms. Hunter, I'm going to need you to answer
14 the questions for each statement for the record. So
15 did you personally see or hear the statement "We are
16 professional grade - it's not a promotion, it's a
17 promise"?
18 A I'm quite sure I did see it in a TV
19 commercial.
10:54 20 Q How did you know you saw this statement?
21 A Because they had a commercial.
22 Q You know the statement was on the commercial?
23 A I'm not sure. I can't remember right now.
24 Q This is the same commercial that you were
25 talking about before?

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1 A Yes.
2 Q Is there -- there's only one TV commercial
3 that you saw about the 2001 Yukon?
4 A Yes.
5 Q What about the next statement, "Safety -
6 designed to protect," did you personally see or hear
7 that statement?
8 A I don't recall.
9 Q What about the rest of these statements in
10:55 10 paragraph 58, the bullet points?
11 MR. SPIRO: Still compound.
12 BY MS. GUZMAN:
13 Q Can you tell me whether you personally saw or
14 heard any of these statements in paragraph 58?
15 MR. SPIRO: Compound. Oh, gosh, there's a
16 dozen of them. Compound.
17 If you are going to do that, go one by one.
18 THE WITNESS: Do what? I didn't make the
19 commercial, so -- I was only -- my only thing was --
10:55 20 MR. SPIRO: No, hold on: I'm not asking you
21 questions, so you don't answer my questions. I'm just
22 telling you, if you are going to answer her question,
23 go one by one.
24 So you left off at page 24, the previous,
25 you're not on it.

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1 THE WITNESS: I'm on page 25, the last one.
2 MR. SPIRO: You can go backwards, if you
3 want, but -- but you have to go one by one, otherwise
4 it is unfair to try and answer.
5 What I mean is --
6 MS. GUZMAN: Mr. Spiro, I'm sorry, if you
7 have an objection, you can make it, but I would like
8 the witness to answer my question as I've asked it.
9 MR. SPIRO: Well, then, she's not going to
10:56 10 answer it.
11 MS. GUZMAN: Are you instructing her not to
12 answer?
13 MR. SPIRO: Yes. She's going to answer it
14 one by one or not at all.
15 MS. GUZMAN: On what basis are you
16 instructing her --
17 MR. SPIRO: Compound and it's harassing. You
18 can't try and get a witness to answer eight questions
19 in one answer. It is more than eight, it is like 12.
10:56 20 It is unfair, it is a trick.
21 BY MS. GUZMAN:
22 Q Ms. Hunter, I'm asking you --
23 A It is 15.
24 MR. SPIRO: So answer -- look at the next
25 one, which is this one, and then answer.

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1 MS. GUZMAN: Mr. Spiro, state your objection,
2 if necessary, otherwise, let your witness try to
3 answer my question.
4 MR. SPIRO: I am, but I instructed her in how
5 to answer, and I am entitled to do that because your
6 question is a trick question.
7 MS. GUZMAN: You're not entitled to be able
8 to instruct her how to answer a question.
9 MR. SPIRO: In the manner -- yes, I am in
10:57 10 this situation where you're asking her a trick
11 question. Or else not, you take your choice.
12 BY MS. GUZMAN:
13 Q Ms. Hunter, are there any statements in
14 paragraph 58 that you know, you personally saw or
15 heard?
16 MR. SPIRO: Go one by one, please.
17 Look at each one and answer.
18 THE WITNESS: Well, I've already answered the
19 question basically for all of them. And, just like I
10:57 20 said, I'm not trying to make the commercial with GM or
21 memorize anything that they said or done. I liked the
22 truck and that's why I purchased it.
23 BY MS. GUZMAN:
24 Q So you don't know whether you personally saw
25 or heard any of these specific statements listed in

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11 (Pages 41 to 44)

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1 paragraph 58 of your complaint?
2 MR. SPIRO: Mischaracterizes her testimony
3 and is extremely compound. It is asking her about
4 18 --
5 BY MS. GUZMAN:
6 Q Go ahead and answer --
7 MR. SPIRO: Hold on. Don't interrupt my
8 objection.
9 MS. GUZMAN: If you make a form objection,
10:58 10 that's a fine, but speaking objections are against the
11 rules.
12 MR. SPIRO: Yeah, and I'm making a form
13 objection, it is compound and asking 18 questions.
14 MS. GUZMAN: "Compound" will be sufficient,
15 thank you.
16 MR. SPIRO: No, it is not sufficient. I am
17 entitled to do more than say one word, Counsel.
18 BY MS. GUZMAN:
19 Q Ms. Hunter, do you need me to repeat the
10:58 20 question?
21 A Yes, go ahead.
22 Q Do you personally know whether you saw or
23 heard any of the statements listed in paragraph 58 of
24 your complaint?
25 MR. SPIRO: All right. Compound, harassing
Page 45

1 Q What was the answer you stated before?
2 MR. SPIRO: No, she's not going to repeat her
3 answer. You can look at the record if you want.
4 MS. GUZMAN: Are you instructing her not to
5 answer?
6 MR. SPIRO: Yes. You're harassing her trying
7 to get her to answer what she answered before.
8 (Instruction not to answer.)
9 BY MS. GUZMAN:
11:00 10 Q Let's go one by one. Let's look at the
11 fourth paragraph on the list in paragraph 58. Would
12 you read that statement to me, Ms. Hunter.
13 A What page are you on? 25 or 24?
14 Q 24. It is the one that begins with
15 "Recently."
16 Would you read the statement.
17 A I've already read it.
18 Q You're right. I didn't specify. Thank you.
19 So I'll read it out loud.
11:00 20 "Recently our achievements in safety were
21 recognized by a leading magazine, a leading insurance
22 company and a one-year-old from South Carolina."
23 Did you personally see or hear this
24 statement?
25 A I -- I -- I don't know. I don't know.
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1 the witness because she's already answered it and --
2 MS. GUZMAN: I will ask this question as many
3 times as I need to to get an answer.
4 MR. SPIRO: Go ahead. You got an answer,
5 Counsel. You got an answer. She already answered
6 your question. You're trying to get another answer,
7 so I'll keep objecting, and I'm not yet having her
8 stop -- refuse to answer. So I'll complete my
9 objection.
10:59 10 It's compound, it's asked and answered, it's
11 harassing. She's already answered. And there are 18
12 questions, and she's also answered specifically on
13 three of them.
14 BY MS. GUZMAN:
15 Q Do you need me to repeat the question,
16 Ms. Hunter?
17 MR. SPIRO: For the record, my objections
18 will be the same.
19 Go ahead, Counsel.
10:59 20 BY MS. GUZMAN:
21 Q Do you know whether you personally saw or
22 heard any of the statements listed in paragraph 58 of
23 your complaint?
24 A As I previously stated before, the answer is
25 the same, and it is not going to change.
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1 Q Do you contend that it is false?
2 MR. SPIRO: Don't answer that. She's not
3 required to answer about her contentions.
4 MS. GUZMAN: Are you instructing her not to
5 answer?
6 MR. SPIRO: Yes.
7 (Instruction not to answer.)
8 MS. GUZMAN: On what basis?
9 MR. SPIRO: Based on the Rifkind case and
11:01 10 other cases that follow it.
11 BY MS. GUZMAN:
12 Q Ms. Hunter, I'd like to move to the next
13 statement, "Effective Safety Innovations" --
14 MR. SPIRO: It is harassing. I'm sorry, I
15 need to explain that further. It is harassing, it is
16 an unfair question.
17 BY MS. GUZMAN:
18 Q Ms. Hunter, is your answer going to be the
19 same for every statement in this list?
11:01 20 A Yes.
21 Q Okay.
22 MR. SPIRO: No -- okay.
23 MS. GUZMAN: Take a break. We're going to
24 take a 10-minute break and then -- and go off the
25 record.
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12 (Pages 45 to 48)

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1 THE VIDEOGRAPHER: We're going off the record
2 at 11:02. We are off the record.
3 (Recess.)
4 THE VIDEOGRAPHER: We are back on the record
5 at 11:29.
6 BY MS. GUZMAN:
7 Q Ms. Hunter, how many different dealers did
8 you visit before you purchased your Yukon?
9 A I only went to the credit union.
11:29 10 Q Did you go to Justice Auto?
11 A Yes, I did.
12 Q How many times did you visit Justice Auto?
13 A Once.
14 Q Did you speak with anyone there about
15 purchasing this car?
16 A Did I speak to anyone? Where?
17 Q At Justice Auto.
18 A Yes.
19 Q Do you recall any of your conversations?
11:29 20 A No.
21 Q Do you know who you spoke with?
22 A No, I can't remember his name.
23 Q Did you ask him any questions about the
24 parking brake?
25 A No.

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1 A No.
2 Q Knowing what you know now, would you have
3 purchased any other vehicle than the Yukon you did
4 purchase?
5 MR. SPIRO: Vague, confusing.
6 THE WITNESS: Explain it.
7 BY MS. GUZMAN:
8 Q Did you ask me to explain it?
9 A Uh-huh.
11:31 10 Q Okay. Would you have purchased any other
11 vehicle than the Yukon you bought, knowing what you
12 know now?
13 A In 2000 -- you're asking me in 2001 would I
14 would have purchased it if I knew what I knew now?
15 Q Yes.
16 A No.
17 Q Why not?
18 A Why not? Because their parking brake is
19 unsafe.
11:31 20 Q Any other reasons?
21 A No.
22 Q What do you mean by "unsafe"?
23 A What do I mean by "unsafe"?
24 Q Yes.
25 A The parking brakes are defective.

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1 Q Do you remember any of the other questions
2 that you asked?
3 A No.
4 Q Do you remember if it was a male or female?
5 A It was a male.
6 Q Did you ever talk to any other Yukon owner
7 about the car?
8 A No.
9 Q Did you compare the Yukon with other vehicles
11:30 10 before buying it?
11 A No.
12 Q Did you have a sense of GM's reputation
13 before you bought your Yukon?
14 A Did I have a sense of reputation?
15 MR. SPIRO: Vague.
16 THE WITNESS: You want me to answer?
17 BY MS. GUZMAN:
18 Q Uh-huh.
19 A Did I have a sense of reputation? I knew
11:30 20 that they built good cars.
21 Q Did you have any prior experience with GM?
22 A No.
23 Q Have you ever owned a GM car before?
24 A No.
25 Q Did you know the reputation of Justice Auto?

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1 Q What do you mean by "defective"?
2 A They have to be replaced.
3 Q Do you recall seeing any documents before you
4 purchased your Yukon?
5 A No.
6 Q Do you recall seeing any documents while you
7 purchased your Yukon?
8 A Any documents of -- what are you talking
9 about?
11:32 10 Q Did you have to sign any documents?
11 A Sign what kind of documents?
12 Q Any documents at all in order to purchase
13 your Yukon.
14 A Yes, I had to sign the loan documents.
15 Q What are the law documents?
16 A The loan documents.
17 Q Oh, sorry.
18 What are the loan documents?
19 A They are documents agreeing to pay back the
11:33 20 money I borrowed.
21 Q Did you sign any other documents?
22 A No.
23 Q Did you receive any other documents?
24 A Did I receive any documents from who?
25 Q From the sales representative you spoke with

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13 (Pages 49 to 52)

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1 at Justice Auto.
2 A No.
3 Q Ms. Hunter, would you turn to page -- I'm
4 sorry, it is in the fourth amended complaint.
5 MR. SPIRO: That's what's in front of you.
6 BY MS. GUZMAN:
7 Q On page 22, paragraph 56. Let me know when
8 you're there.
9 A I'm here.
11:34 10 Q At line 18 and continuing, you state, "GM
11 distributed throughout its authorized dealer network
12 and provided to all new and would-be new car
13 purchasers product brochures containing the following
14 representations."
15 Did you receive any product brochures?
16 A I received the owner's manual with the car.
17 Q Anything else?
18 A No.
19 Q You never received or saw any brochures
11:34 20 containing the representations contained in paragraph
21 56?
22 A No.
23 Q Now if you could turn to paragraph 47. It is
24 on page 17 at line 21.
25 Let me know when you're there, please.
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1 A I'm here.
2 Q And paragraph 47 --
3 MR. SPIRO: Oh, I'm sorry, I turned to the
4 wrong page. Excuse me. Okay. Thank you.
5 BY MS. GUZMAN:
6 Q In paragraph 47 at the second sentence I'll
7 begin. You state, "GM's predelivery and inspection
8 procedure requires its authorized dealers to
9 thoroughly test and inspect each of the subject
11:35 10 vehicles before they were delivered to plaintiffs and
11 others similarly situated. After the vehicle is
12 tested and inspected, according to GM's protocol and
13 procedure, a GM authorized predelivery inspection form
14 is filled out affirmatively checking each box that the
15 vehicle has been tested, inspected, and is in working
16 order."
17 What document are you referring to when you
18 say "predelivery inspection form"?
19 MR. SPIRO: I object, the use of the phrase
11:36 20 "you," she didn't write this complaint. It misstates
21 the evidence and it's confusing.
22 THE WITNESS: No, because I don't know.
23 BY MS. GUZMAN:
24 Q You don't know what a predelivery inspection
25 form is?
Page 54

1 A No, I don't.
2 Could you explain it?
3 Q Did --
4 A Explain what GM's predelivery inspection
5 procedure -- after they didn't deliver it.
6 Q That's something you'll probably have to talk
7 to your counsel about, Ms. Hunter. That was my
8 question for you. But since you don't know, I'll move
9 on to my next question.
11:37 10 Can you please turn to paragraph 50 of the
11 complaint.
12 A What page?
13 MR. SPIRO: What page is that?
14 BY MS. GUZMAN:
15 Q Page 18, about line 23.
16 A You mean between 23 and 24?
17 Q Yes.
18 A Number 50.
19 Q Yes.
11:37 20 A "In accordance with GM's 'Completely
21 Satisfied - New Vehicle Delivery System' procedure,
22 each of the subject vehicles that were purchased new
23 from one dealer within GM's authorized dealer network
24 were required to be 'inspected, explained and
25 demonstrated.'"
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1 Q On what do you base this allegation in
2 paragraph 50?
3 MR. SPIRO: You don't have to answer that.
4 Don't answer.
5 MS. GUZMAN: Are you instructing your witness
6 not to answer?
7 MR. SPIRO: Let me think about that.
8 I'll object that it is compound, and the
9 "you" is confusing because she didn't write the
11:38 10 complaint, but I'll let her answer.
11 BY MS. GUZMAN:
12 Q Go ahead.
13 A Okay. "In accordance with GM's 'Completely
14 Satisfied - New Vehicle Delivery System' procedure,
15 each of the subject vehicles that were purchased new
16 from one dealer within GM's authorized dealer network
17 were required to be 'inspected, explained and
18 demonstrated.'"
19 The dealer didn't explain, did not
11:38 20 demonstrate, and it is unknown if it was inspected.
21 Q Did not what?
22 A This is within GM's authorized dealer
23 network.
24 Q Are you saying that the --
25 A I don't know who their authorized dealer
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1 network is.
2 Q What about the dealer that you visited, did
3 they explain and demonstrate the features and controls
4 to you?
5 A No, they didn't.
6 Q Do you know whether they inspected them?
7 A No, I don't.
8 Q In paragraph 51, the very next paragraph, you
9 state that "The GM 'New Delivery Vehicle System'
11:39 10 procedure requires that the GM authorized sales
11 representative complete a GM authorized form."
12 Do you know what form that refers to?
13 A No.
14 Q Did you receive any form from the GM
15 authorized sales representative?
16 A No.
17 Q Ms. Hunter, I'm handing you what's been
18 previously Bates-labeled as GM HUNTER 2998 ending at
19 page GM HUNTER 3416. And I'm going to mark it as
11:40 20 Deposition Exhibit -- what number are we at now?
21 THE REPORTER: 5.
22 THE WITNESS: 5.
23 MS. GUZMAN: Thank you.
24 (Deposition Exhibit 5 marked.)
25 BY MS. GUZMAN:

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1 Q Do you recognize Deposition Exhibit 5?
2 A Yes.
3 Q What is it?
4 A Owner's manual.
5 Q Did you receive a copy of the owner's manual?
6 A Yes.
7 Q When did you receive this copy -- a copy of
8 the owner's manual?
9 A It was with the purchase of the vehicle.
11:41 10 Q Did you receive it before or after you
11 purchased the car?
12 A Did I receive it before or after? It had to
13 be after I gave them the check for the car that I
14 realized I had the owner's manual with the car.
15 Q Did you read it?
16 A No.
17 Q Did the owner's manual affect your decision
18 to purchase the car?
19 A No.
11:41 20 Q I'm going to ask you to turn to page 19 of
21 the fourth amended complaint. In paragraph 54 between
22 lines 17 and 18 you state, "The GM owner's manual that
23 was specifically mentioned in GM's predelivery
24 inspection procedure and that came with each of the
25 subject vehicles at issue makes the following

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1 representations," and then you list some
2 representations.
3 Do you think that any of the instructions in
4 the owner's manual are false?
5 MR. SPIRO: Don't -- vague, compound.
6 If you're going to answer that, go one by
7 one, look at each one, give an answer to each one.
8 And I mean each paragraph. Read it to
9 yourself, out loud, whatever you want, and then answer
11:43 10 the question.
11 This is really a harassing question. This
12 thing goes on for two pages.
13 THE WITNESS: Three -- one, two, three --
14 MR. SPIRO: You're right.
15 THE WITNESS: -- almost four.
16 MR. SPIRO: Wow, I think it is like three,
17 but, anyway.
18 So start with the first --
19 THE WITNESS: I'm not an auto mechanic, so I
11:43 20 don't know nothing about a brake.
21 MR. SPIRO: Well, there's --
22 THE WITNESS: So what -- what are you looking
23 for? What do you want me to tell you? I can read you
24 all of what the owner's manual say?
25 BY MS. GUZMAN:

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1 Q Do you need to have the question repeated?
2 A Yes, go ahead.
3 MS. GUZMAN: Court reporter, will you please
4 read back the question.
5 (Record read as follows:
6 "Q Do you think that any of
7 the instructions in the owner's
8 manual are false?")
9 MR. SPIRO: Well, I also object to that, but
11:44 10 there's nothing to show there are any instructions in
11 this. It says "representations." Misquoting the
12 evidence, Counsel.
13 THE WITNESS: That's not, parking brake to
14 set the parking brake -- okay.
15 MR. SPIRO: La Ronda, please, I want you to
16 go one by one. Maybe you are. Are you on the first
17 paragraph there?
18 THE WITNESS: Uh-huh.
19 MR. SPIRO: All right.
11:44 20 THE WITNESS: She asked me is there anything
21 false --
22 MR. SPIRO: Right.
23 THE WITNESS: About the -- in the owner's
24 manual --
25 MR. SPIRO: No.

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15 (Pages 57 to 60)

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1 THE WITNESS: — or in the instructions.
2 MS. GUZMAN: Counsel, I'm going to ask you
3 again, for the record, to please state your objections
4 and refrain from making any other speeches. This is
5 not an opportunity for you to coach your witness.
6 MR. SPIRO: I'm not coaching my witness. You
7 know very well I'm not.
8 BY MS. GUZMAN:
9 Q Ms. Hunter, would you please answer the
11:45 10 question.
11 A To set the parking —
12 MR. SPIRO: You mean the 27 questions?
13 THE REPORTER: I can only get one person at a
14 time.
15 MR. SPIRO: All right. Go ahead.
16 THE WITNESS: Okay. This is an instruction:
17 "Parking Brake. To set the parking brake, hold the
18 regular brake pedal down with your right foot."
19 That's not false.
11:45 20 MR. SPIRO: Hold on, excuse me —
21 THE WITNESS: "This manual includes the" —
22 MR. SPIRO: — you skipped the first
23 paragraph.
24 THE WITNESS: That's not an instruction,
25 though.

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1 MR. SPIRO: I know it isn't. But that's why
2 the question is vague.
3 Do you want her to answer on each — do you
4 want her to skip the ones that aren't instructions,
5 Counsel, or do you want her to answer as to each of
6 those paragraphs?
7 MS. GUZMAN: I want her to answer however she
8 needs in order to answer —
9 MR. SPIRO: No, you have to clarify your
11:46 10 question. Do you want her to go on each paragraph
11 there or do you want her to skip the ones that don't
12 appear to be instructions? I need to know that and so
13 does she. And don't try and trick her —
14 THE WITNESS: I —
15 MS. GUZMAN: I asked her about instructions.
16 She can answer about the instructions.
17 MR. SPIRO: Yeah, so which ones, in your
18 view, are instructions? You have to make that clear
19 to her.
11:46 20 BY MS. GUZMAN:
21 Q Ms. Hunter, do you understand the question?
22 A Yes, I do.
23 MR. SPIRO: No —
24 BY MS. GUZMAN:
25 Q Would you please answer it.

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1 MR. SPIRO: — I'm sorry, even though she
2 said that, you are asking a trick question. I want
3 you to tell her which ones you're referring to. If
4 you don't do that, she's not answering, Counsel.
5 MS. GUZMAN: Counsel, it's not a trick
6 question and she said she understands it.
7 MR. SPIRO: It doesn't matter, because you
8 might think instructions mean something different from
9 what she thinks, the jury might think instructions
11:46 10 mean something different from what she thinks, the
11 judge might think it is something different.
12 So you're trying to trick her, you know that
13 you are. I want you to tell her which paragraphs you
14 want her to answer about, otherwise she's not going to
15 answer.
16 MS. GUZMAN: Are you instructing her not to
17 answer the question as it's been stated?
18 MR. SPIRO: If she'll go through each
19 paragraph, then, no, I'm not instructing her then.
11:47 20 But she needs to go through each paragraph. I'm
21 instructing her to do that. Whether it is a quote,
22 instruction paragraph or not, because nobody knows
23 whether it is for sure.
24 BY MS. GUZMAN:
25 Q Go ahead, Ms. Hunter.

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1 A Okay.
2 MR. SPIRO: Please start at the first
3 paragraph.
4 THE WITNESS: "The manual includes the latest
5 information at the time it was printed. Please keep
6 this manual in your vehicle so it will be there if you
7 ever need it when you're on the road. If you sell
8 your vehicle, please leave this manual in it so that
9 the new owner can use it."
11:47 10 MR. SPIRO: What's the question, Counsel?
11 BY MS. GUZMAN:
12 Q Do you think that statement is false?
13 MR. SPIRO: I object. That's vague and
14 ridiculous. An instruction can't be true or false.
15 It's an instruction.
16 THE WITNESS: "Parking brake. To set the
17 parking brake" —
18 BY MS. GUZMAN:
19 Q I'm sorry, Ms. Hunter, can I have the answer
11:48 20 to the question I just asked?
21 MR. SPIRO: It is compound, too.
22 THE WITNESS: It is instructing me to leave
23 the manual in if I sell the car.
24 MR. SPIRO: How can that be true or false,
25 Counsel?

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1 BY MS. GUZMAN:
2 Q Is there anything --
3 A So that the new owner can use it. It is
4 telling me -- basically it is instructing me to leave
5 it -- is it true or false? I can't say whether it is
6 true or false because I don't know.
7 BY MS. GUZMAN:
8 Q Is there anything misleading about that
9 statement to you?
11:48 10 A I don't know what "misleading" mean?
11 The next one, park brake -- "Parking
12 brake" --
13 Q I'm sorry, Ms. Hunter, I still need the
14 answer to the question.
15 MR. SPIRO: She answered.
16 THE WITNESS: I don't know what "misleading"
17 mean.
18 BY MS. GUZMAN:
19 Q Is there anything confusing about that
11:48 20 statement to you?
21 A No, but this manual -- it's -- I don't know
22 what's true or false about leaving -- it is telling me
23 to leave a manual in so the new owner can use it, so I
24 don't know what's true or false about it.
25 Q Is that confusing?

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1 Q What about the next one, "To release the
2 parking brake, hold the regular brake pedal down, pull
3 the bottom edge of the lever located above the parking
4 brake pedal marked 'Brake Release' to release the
5 parking brake." Is that, in fact, how you release the
6 parking brake in your Yukon?
7 A Yes.
8 Q Is there anything confusing about that
9 instruction to you?
11:50 10 A No.
11 Q What about the next one, "It can be dangerous
12 to get out of your vehicle if the shift lever is not
13 fully in park with the parking brake firmly set. Your
14 vehicle can roll. You or others can be injured. To
15 be sure your vehicle won't move even when you're on
16 fairly level ground, use the steps that follow."
17 Would you review the steps that follow that.
18 They would be lines 1 through 18 of page 20.
19 A "It can be dangerous to set your vehicle" --
11:51 20 "your vehicle can roll. You or others can be injured.
21 To be sure your vehicle will move when" -- "use the
22 steps as follows."
23 MR. SPIRO: What follows there is not the
24 steps that's being referred to, Counsel.
25 Don't answer that. It misstates what this

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1 A No.
2 Q How about the next instruction, "To set the
3 parking brake, hold the regular brake down with your
4 right foot," is that, in fact, how you set the parking
5 brake in your Yukon?
6 A No. To set the parking brake, hold the
7 regular with your right foot?
8 Q How do you set the parking brake in your
9 Yukon?
11:49 10 A I'm a lefty.
11 Q What does that mean?
12 A Everything is done with my left side.
13 Q So you hold the regular brake pedal down with
14 your left foot?
15 A Depends. Depends on the situation.
16 Q What do you mean by that?
17 A Well, if the right leg is broke, I have no
18 choice to use but the left foot.
19 Q But you hold the regular brake pedal down
11:50 20 with whatever foot you use?
21 MR. SPIRO: Argumentative.
22 BY MS. GUZMAN:
23 Q Is there anything confusing about that
24 instruction to you?
25 A No.

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1 document says.
2 MS. GUZMAN: Are you instructing your witness
3 not to answer?
4 MR. SPIRO: What's the question again?
5 BY MS. GUZMAN:
6 Q Are any of the instructions that follow
7 confusing?
8 MR. SPIRO: That wasn't the question -- oh,
9 what are they, Counsel? Yeah, don't answer that
11:52 10 because we don't know what you're talking about.
11 BY MS. GUZMAN:
12 Q Okay. Ms. Hunter, would you read lines 1
13 through 18 and let me know if anything in there is
14 confusing or misleading to you.
15 MR. SPIRO: Which one, Counsel? That's
16 compound. Confusing and misleading. It is compound;
17 I don't know how she can answer.
18 THE WITNESS: "Leaving your vehicle with the
19 engine running" --
11:52 20 MR. SPIRO: It is multiple compound because
21 it is about 40 lines --
22 THE WITNESS: -- "It can be dangerous to
23 leave your vehicle" --
24 THE REPORTER: I can only get one person at a
25 time.

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17 (Pages 65 to 68)

LA RONDA HUNTER

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1 MR. SPIRO: It is about 30 lines of typing
2 and there's two questions as to each line -- as to
3 each statement, or whatever.
4 BY MS. GUZMAN:
5 Q Have you reviewed lines 1 through 18?
6 A No.
7 Q Can you answer my question?
8 A What's the question?
9 MR. SPIRO: How can she do that without
11:53 10 reading it, Counsel?
11 Don't answer the question without reading it.
12 What kind of thing is that?
13 MS. GUZMAN: I asked if she could.
14 Q Can you answer it --
15 MR. SPIRO: She said she hasn't read it. She
16 obviously can't answer it without reading it.
17 Don't answer without reading it.
18 BY MS. GUZMAN:
19 Q Go ahead and read it.
11:53 20 MR. SPIRO: Stop trying to harass my client.
21 This is preposterous.
22 THE WITNESS: Repeat the question so I can
23 read it. Repeat the question so I can read it.
24 MS. GUZMAN: Court reporter, can you please
25 read the question back.

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1 (Record read as follows:
2 "Q Okay. Ms. Hunter, would
3 you read lines 1 through 18 and let
4 me know if anything in there is
5 confusing or misleading to you.")
6 MR. SPIRO: You asked her to read it,
7 Counsel; she's entitled to read it.
8 La Ronda, before you answer, I want you to go
9 through each one and give a separate answer to each
11:55 10 paragraph -- or, actually, those paragraphs are rather
11 long. Try each sentence.
12 THE WITNESS: The one says suppose after
13 stalling I try to back down the hill and decide I just
14 can't do it, what shall I do.
15 MR. SPIRO: Start from the top and --
16 THE WITNESS: I'm not going to answer that
17 one.
18 MR. SPIRO: All right.
19 THE WITNESS: Use common sense for that one.
11:56 20 MR. SPIRO: The question is confusing or
21 misleading?
22 BY MS. GUZMAN:
23 Q Ms. Hunter, do you need me to read back the
24 question?
25 A Yes, go ahead.

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1 MS. GUZMAN: Court reporter, would you mind
2 reading back the question.
3 THE WITNESS: Reading line 1 through 18 --
4 MR. SPIRO: Yeah, she wanted you to do that
5 but she had a question. Counsel had a question which
6 I think was confusing and misleading, but the court
7 reporter will read it back.
8 (Record read as follows:
9 "Q Okay. Ms. Hunter, would
11:56 10 you read lines 1 through 18 and let
11 me know if anything in there is
12 confusing or misleading to you."
13 THE WITNESS: Yes, it is. What should I do?
14 BY MS. GUZMAN:
15 Q What line is that at?
16 A I guess number 26. My car is not a
17 four-wheel drive -- my car is not a four-wheel drive,
18 it is a two-wheel drive.
19 Q But in lines 1 through 18, was there anything
11:57 20 that was confusing to you?
21 A 20 --
22 MR. SPIRO: Don't answer that without going
23 through each sentence and giving a separate answer for
24 each sentence, please.
25 THE WITNESS: Well, that was line 26.

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1 MR. SPIRO: You're going below where she
2 wanted you to.
3 THE WITNESS: Oh, 1 through 18.
4 MR. SPIRO: Start at 1 --
5 THE WITNESS: Okay. I've already said
6 leaving your vehicle with the engine running, that's
7 confusing.
8 Why would I want to leave my vehicle with the
9 engine running? We live in L.A. They are going to
11:57 10 steal it.
11 BY MS. GUZMAN:
12 Q Are you saying that that line is confusing to
13 you?
14 MR. SPIRO: She just said it, yes.
15 THE WITNESS: "Caution, it can be dangerous
16 to leave your vehicle with the engine running. Your
17 vehicle can move suddenly if the shift lever is not
18 put in park with the parking brake firmly set."
19 If you have four-wheel drive -- like I stated
11:58 20 before, I don't have a four-wheel drive, I have a
21 two-wheel drive, and this refers to a four-wheel
22 drive.
23 MR. SPIRO: Stop and answer what you've read
24 so far in that paragraph is confusing or misleading to
25 you.

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1 THE WITNESS: Yeah, it is confusing and
2 misleading because I don't have a four-wheel drive, I
3 have a two-wheel drive, and this is what it states.
4 BY MS. GUZMAN:
5 Q What's confusing about that?
6 A It is telling me if I have a four-wheel
7 drive --
8 Q But you don't have a four-wheel drive, do
9 you?
11:58 10 A No. It can be dangerous leaving your vehicle
11 with the engine running.
12 Q But you don't have a four-wheel drive.
13 MR. SPIRO: Argumentative. That isn't a
14 question. Don't answer it.
15 (Instruction not to answer.)
16 MS. GUZMAN: Are you instructing your witness
17 not to answer?
18 MR. SPIRO: If you ask a question, then
19 you'll get an answer, but saying, "You don't have a
11:59 20 four-wheel drive" is not a question.
21 BY MS. GUZMAN:
22 Q My question is: You don't have a four-wheel
23 drive, do you?
24 A No, I don't have a four-wheel drive, Kelly.
25 Q So then a statement that begins, "If you have
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1 A It doesn't say that. "If you continue to
2 leave your vehicle running, if the shift lever is not
3 fully in park with the parking brake fully set" --
4 Q I'm sorry, Ms. Hunter, you're going to have
5 speak up so I can hear what you're saying.
6 A It says, "Caution. It can be dangerous to
7 leave your vehicle with the engine running. Your
8 vehicle can move suddenly if the shift lever is not
9 fully in park with the parking brake firmly set."
12:00 10 You asked me was that misleading and
11 confusing. As stated previously, the answer is still
12 the same, it is not going to change. Can we move on?
13 Q Do you think that is confusing?
14 A Yes, it's confusing. As I just -- I --
15 Q Now, Ms. Hunter, I'm going to ask you a
16 slightly different question. What is confusing to you
17 about that statement?
18 A I don't have -- I have a two-wheel drive.
19 Q Where does that statement say anything about
12:01 20 two-wheel drive?
21 A It don't.
22 Q Then what part of that statement is
23 confusing?
24 A I just told you previously.
25 Q Ms. Hunter, did you have any communication
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1 a four-wheel drive," doesn't apply to you, does it?
2 MR. SPIRO: Argumentative.
3 THE WITNESS: It says, "Caution, it can be
4 dangerous to leave your vehicle with the engine
5 running. Your vehicle can move suddenly if the shift
6 lever is not fully parked with your parking brake
7 firmly set," in bold letters first.
8 BY MS. GUZMAN:
9 Q That didn't answer my question. My question
11:59 10 was --
11 A I did answer your question.
12 Q I'm sorry, you didn't answer exactly my
13 question.
14 MR. SPIRO: Don't argue with my client,
15 please.
16 BY MS. GUZMAN:
17 Q My question was --
18 A You want to know if it is misleading or
19 confusing? Yes it is.
11:59 20 Q And what about that is misleading or
21 confusing?
22 A I just stated as previously stated.
23 Q You're confused by the sentence, "If you have
24 four-wheel drive and your transfer case is in neutral
25 your vehicle will be free to roll?"
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1 with General Motors?
2 A No.
3 Q Now, on April 6th, 2008 you had the parking
4 brake on your car repaired; is that correct?
5 A No.
6 Q What is incorrect about that?
7 A It is the wrong year.
8 Q What year did you have it repaired?
9 A 2005 of April.
12:01 10 Q How many miles did your car have on it when
11 it was repaired?
12 A I don't know. I don't know right now.
13 Q Was it more than 20,000?
14 A I don't know. I would have to look at the
15 document and see. It's on the document.
16 Q Okay. We'll get to the document later, then.
17 Why did you have your parking brake repaired?
18 A Because it went out.
19 Q What was -- when was the first time that it
12:02 20 went out?
21 A When is the first time it went out? April
22 2005.
23 Q Do you know what day?
24 A I don't recall the exact day.
25 Q What do you mean --
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19 (Pages 73 to 76)

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1 A I took it to get -- it got repaired.
2 Q What do you mean by "went out"?
3 A The light came on.
4 Q Did it still hold the vehicle?
5 A Unknown.
6 Q What was that?
7 A I don't know. Unknown, unknown, did it hold
8 the vehicle.
9 Q Did the parking brake work?
12:03 10 A You can push it all the way down to the
11 floor.
12 Q What does that mean?
13 A When you push it down with your feet -- when
14 I pushed it down with my left foot, and it goes all
15 the way to the floor.
16 Q Did it hold the car when you did that?
17 A I'm going to say yes. Yes.
18 Q So you took it to get repaired just because
19 you saw the light go on?
12:03 20 A Yeah, every time a light come on in my car, I
21 take it to be repaired.
22 Q Where did you take it?
23 A To Power Chevrolet, Hawthorne, California.
24 Q Why did you take it there?
25 A That's where I always take my car.

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1 of that document.
2 MR. SPIRO: Which exhibit number is it?
3 MS. GUZMAN: The form interrogatories are
4 Exhibit Number 1.
5 MR. SPIRO: Thank you.
6 What's the matter?
7 THE WITNESS: There is a bug flying.
8 MR. SPIRO: A bug.
9 BY MS. GUZMAN:
12:06 10 Q Do you recognize this document that's marked
11 Exhibit A?
12 A Yes.
13 Q What is it?
14 A It's where I took my truck to go get repaired
15 because GM refused to fix it.
16 Q I--
17 A They fixed the ABS, but they wouldn't fix the
18 parking brake.
19 Q Okay. And that was at Power Chevrolet that
12:06 20 they wouldn't fix the parking brake?
21 A Yes.
22 Q Did they say anything about the power brake
23 to you?
24 A No, everything was a secret. Everything is
25 still a secret.

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1 Q Why do you always take your car there?
2 A Why do I always take my car there? Because
3 that's where I always take it.
4 Q When you took your car to Power Chevrolet in
5 April of 2005, did you speak with anyone?
6 A To the mechanic.
7 Q What did you say?
8 A I told him that my ABS and my parking light
9 was on.
12:04 10 Q What did he say?
11 A He would do a diagnosis on it.
12 Q Did he do that diagnosis?
13 A Yes.
14 Q And what were the results of that diagnosis?
15 A I don't know. I have no idea. I don't know.
16 I'm not a mechanic. I don't know. He just told me
17 how much it would cost to get it fixed and repair the
18 vehicle.
19 Q Did you speak with anyone else?
12:05 20 A No.
21 Q Was anyone else present while you were
22 speaking with the mechanic?
23 A No.
24 Q Ms. Hunter, can you turn to your form
25 interrogatories, Exhibit A that's attached at the end

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1 Q Did you ask them to fix it?
2 A Yes, I did.
3 Q Did they tell you why they wouldn't?
4 A No.
5 Q So you went to Dagher Automotive?
6 A Uh-huh -- yes.
7 Q Who did you speak with at Dagher Automotive?
8 A I don't know his name.
9 Q Just one person?
12:07 10 A Yes.
11 Q What did you say to him?
12 A That my parking brake light was on.
13 Q And what did he say to you?
14 A Okay. He'll fix it.
15 Q Did he tell you what was wrong with the
16 parking brake?
17 A No.
18 Q It says on this document, "Customer supply
19 all the parts."
12:07 20 Did you supply the parts for that repair?
21 A Yes.
22 Q Where did you get those parts?
23 A Across the street.
24 Q What is across the street?
25 A A little automotive part place from my job.

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20 (Pages 77 to 80)

LA RONDA HUNTER

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1 This is by my job.
2 Q How did you know what parts to get?
3 A I requested for 2001 GM brakes.
4 Q At the place across the street?
5 A Uh-huh.
6 Q Do you know the name of that place?
7 A No, I don't.
8 Q Do you remember who you spoke with there?
9 A No. I don't even know if it still exists.
12:08 10 Q Did you ask the person you spoke with there
11 for -- sorry, let me rephrase that.
12 What did you ask the person you spoke with
13 there for?
14 A 2001 brakes.
15 Q That's it?
16 A That's it.
17 Q You just said "2001 brakes"?
18 A Uh-huh. And I left it in the care of the
19 guy at the -- the one who fixed it.
12:08 20 Q At Dagher Automotive?
21 A Yes, and with the work. So what happened in
22 between, I don't know. What happened then in
23 between --
24 MR. SPIRO: She's not asking you anything.
25 You answered the question.

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1 A It rolled with the parking brake --
2 Q What does that mean --
3 A -- as it rolls now with the parking brake
4 down.
5 MR. SPIRO: Hold on. Could you read me back
6 the answer because I want to make sure you -- it was
7 accurate -- I want to make sure it was accurately
8 taken down. No offense.
9 THE REPORTER: The first one or the second
10 one.
11 MR. SPIRO: Both.
12 (Record read as follows:
13 "Q Did your parking brake
14 ever fail to hold your car?
15 "A It rolled with the parking
16 brake --
17 "Q What does that mean --
18 "A -- as it rolls now with
19 the parking brake down.")
12:10 20 BY MS. GUZMAN:
21 Q When was the first time that your car rolled
22 with the parking brake set?
23 A It's been awhile ago. I don't know.
24 Q Do you know what year?
25 A I can't recall what year, but I know now in

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1 BY MS. GUZMAN:
2 Q How did you know those were the right parking
3 brakes for your 2001 GM Yukon?
4 A How did I know they were the right? Common
5 sense.
6 Q What do you mean by "Common sense"?
7 A If I got a 2001 GMC Yukon, of course common
8 sense would tell me to request for 2001 brakes, right?
9 I wouldn't want 2002 brake shoes, unless it was made
12:09 10 the same. I don't know. I don't know what you're
11 talking about. It is just common sense.
12 Q Well, how did you know they were right for
13 the make and model of your vehicle?
14 A I don't know if it was right.
15 Q Can you identify any specific component of
16 your parking brake system that you believe is
17 defective?
18 MR. SPIRO: What?
19 THE WITNESS: Can I identify --
12:09 20 MR. SPIRO: Vague.
21 THE WITNESS: -- any components? No, I
22 can't, I'm not a mechanic.
23 BY MS. GUZMAN:
24 Q Did your parking brake ever fail to hold your
25 car?

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1 2008 it is to the floor.
2 Q How many times did your car roll with the
3 parking brake set?
4 A I don't -- I don't know.
5 Q Was it more than one?
6 A Of my experience? Yes. My experience, yes.
7 But, like I said, I don't know how many times it
8 rolled. I don't sit in the car at 24 hours so I don't
9 know.
12:11 10 Q Did it roll before the light came on?
11 A No.
12 Q How soon after the light came on did you take
13 your car to the Power Chevrolet dealer?
14 A I don't -- I can't recall, I don't know. I
15 know the light came on and I -- every time the
16 light -- something on -- every time the light come on
17 in my car, I take it to the dealership in the morning
18 before I could go to work, but I don't know.
19 Q Did the car --
12:12 20 A When the light come on, it means something is
21 wrong with it.
22 Q Did the car roll after you had the parking
23 brake replaced at Dagher Automotive?
24 A Yeah, that's why I don't drive it now.
25 Q When was the last time the car rolled with

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21 (Pages 81 to 84)

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1 the parking brake set?
2 A December 2008.
3 Q What do you mean by "roll"?
4 A The definition of roll?
5 Q Not the definition. What do you mean by
6 "roll"?
7 A It rolled.
8 Q How far?
9 A I don't know. It wasn't no feet or nothing
12:13 10 like that, but I don't know how far. I can't estimate
11 how far.
12 Q How fast?
13 A I can't estimate the speed of miles per hour.
14 Q I'm not asking you to estimate. Ms. Hunter,
15 I would like to know whether you know how far or how
16 fast it rolled?
17 MR. SPIRO: Excuse me, you did ask her how
18 fast and she said she didn't know.
19 MS. GUZMAN: Okay.
12:14 20 MR. SPIRO: She also said she can't estimate.
21 BY MS. GUZMAN:
22 Q Was it less than a foot?
23 A I already said -- I already answered the
24 question.
25 Q You actually haven't answered the question
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1 supposed law you just quoted me. It is not the law.
2 BY MS. GUZMAN:
3 Q Ms. Hunter, have you made any other attempts
4 to get the parking brake repaired?
5 A No.
6 Q When you discovered this issue with your
7 parking brake, did you notify the dealer?
8 A When I discovered the issue with the parking
9 brake -- the light came on and I took it to the
12:15 10 dealership. And they didn't fix it, so I took it here
11 and they fixed it.
12 Q Now, you said that after you fixed it, it
13 continued to roll, correct?
14 A I said December 2000 -- you asked me when the
15 last time, I said December 2008.
16 Q So it continued to roll?
17 A If you say so.
18 Q I'm asking what you're saying.
19 MR. SPIRO: She already told you, Counsel,
12:16 20 twice, at least.
21 THE WITNESS: I've already answered the
22 question.
23 BY MS. GUZMAN:
24 Q Ms. Hunter, is it your position that the
25 repair that Dagher Automotive did did not work?
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1 "Was it less than a foot?"
2 A Did I say that. I said I don't know how
3 many -- it wasn't feet and I don't know. I mean, how
4 many, I don't know. I can't estimate how -- if I can
5 get a measuring tape and go out there and come back
6 and do it, I'll tell you.
7 Q So you don't know how far your car rolled
8 with the parking brake set?
9 MR. SPIRO: Don't answer that you. She
12:14 10 already said it twice.
11 (Instruction not to answer.)
12 MS. GUZMAN: Are you instructing your witness
13 not to answer?
14 MR. SPIRO: Yes. You are harassing her.
15 MS. GUZMAN: On what basis?
16 MR. SPIRO: Because you're harassing her.
17 She answered you twice and then you ask her to say it
18 again. What is that?
19 MS. GUZMAN: Counsel, you're only entitled to
12:14 20 instruct your witness not to answer on the grounds of
21 privilege.
22 MR. SPIRO: That's not true.
23 MS. GUZMAN: Are you still instructing her
24 not to answer?
25 MR. SPIRO: Yes. It is not true, the
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1 MR. SPIRO: Don't answer that. She's asking
2 you for a contention.
3 (Instruction not to answer.)
4 MS. GUZMAN: Counsel, are you instructing the
5 witness not to answer?
6 MR. SPIRO: That's right. You can ask a
7 different way and get the answer.
8 MS. GUZMAN: On what basis?
9 MR. SPIRO: Because it is improper to ask a
12:16 10 witness what her contentions are -- it is improper to
11 ask a party what her contentions are. There is case
12 law to that effect, and it is not fair, says the case.
13 BY MS. GUZMAN:
14 Q Did the repair that Dagher Automotive do on
15 your car work?
16 A I have no idea.
17 Q You don't know whether the repair worked?
18 A It stopped until -- and now it is to the
19 floor, so what is the problem, I don't know. I don't
12:16 20 know what the problem is right now.
21 Q Ms. Hunter, I'm sorry, but I just don't
22 understand your answer.
23 A I just don't understand your question,
24 either, because you're asking me something -- you're
25 asking me did it work, did it work or did it did not
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1 work.
2 Q Did Dagher Automotive --
3 A The brakes work but the pedal still goes down
4 to the floor. If I took it in for a diagnosis, no I
5 haven't. If I can go leave and go --
6 MR. SPIRO: No, she hasn't -- isn't asking
7 you that. Don't answer questions that aren't asked.
8 THE WITNESS: But I don't know what's wrong
9 with it now.
12:17 10 BY MS. GUZMAN:
11 Q Why do you think something is wrong with it
12 now?
13 A Because it is not supposed to go to the
14 floor.
15 Q The pedal is not supposed to go to the floor?
16 A Yes.
17 Q But does the parking brake hold the car?
18 A It is supposed to.
19 Q Does it?
12:17 20 A It's on level ground, so --
21 Q Do you know whether the parking brake holds
22 the car?
23 A I don't know. I don't know.
24 Q Did the parking brake ever fail to hold the
25 car?

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1 MR. SPIRO: Now, that's it --
2 THE WITNESS: No.
3 MR. SPIRO: -- she's already answered this
4 four times.
5 BY MS. GUZMAN:
6 Q Did the car roll less than 10 feet?
7 A 10 feet, I can't estimate how many --
8 Q Did the car roll --
9 A If you can let me go and get a measuring tape
10 and do it, I'll come back and tell you.
11 Q I'm asking for what you saw when you saw your
12 car roll with the parking brake set.
13 A I don't know. I can't estimate, Kelly.
14 Q Can you recall any specific occasion where
15 the car rolled with the parking brake set?
16 MR. SPIRO: She's answered this.
17 THE WITNESS: I answered that already.
18 Could you go back and give her the answer to
19 the questions that she's giving me -- I mean, that she
12:19 20 keep asking me?
21 THE REPORTER: I can't answer.
22 BY MS. GUZMAN:
23 Q Ms. Hunter, I'm sorry, but you need to just
24 answer my questions.
25 A Oh, okay.

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1 MR. SPIRO: She just answered this -- well,
2 go ahead.
3 She's answered this --
4 MS. GUZMAN: Counsel, I'm attempting to
5 clarify her testimony.
6 MR. SPIRO: You are?
7 MS. GUZMAN: Please allow me to do so.
8 THE WITNESS: You said did the parking brake
9 ever fail to hold the car? Evidently it did. In the
12:18 10 previous answer you asked me did it roll, I told you
11 it did, but how many feet or foot or whatever, I don't
12 know.
13 BY MS. GUZMAN:
14 Q Well, you said less than a foot before; isn't
15 that right?
16 A No, I told you I can't estimate.
17 MR. SPIRO: No, that's not right.
18 BY MS. GUZMAN:
19 Q Were you there when the car was rolling?
12:18 20 A I guess I was there. It lives at home with
21 me.
22 Q Did you ever personally observe the car roll
23 with the parking brake set?
24 A Yes.
25 Q And you can't tell me how far the car rolled?

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1 Q Can you show me with your hands how far the
2 car rolled?
3 A I'll show you, it do this like. I did that
4 in the beginning. It did like this.
5 MS. GUZMAN: For the record, the witness just
6 moved her finger several inches across the table.
7 THE WITNESS: That's not -- I don't know
8 because I can't estimate how many feet or foot. She
9 asked how it rolled. I don't know.
12:20 10 BY MS. GUZMAN:
11 Q Apart from estimating --
12 A I already answered the question. I don't
13 know. I don't know.
14 Q Was the car on a slope when it rolled?
15 A In my driveway, no.
16 Q Did you ever see the car roll with a parking
17 brake set anywhere other than your driveway?
18 A No.
19 Q And your driveway is a flat surface?
12:21 20 A Yes.
21 Q After you went to Dagher Automotive on April
22 6th of 2005, did the car still roll after that?
23 A I just told you it rolled December 2008.
24 Q Was that the only time it rolled after the
25 repair at Dagher automotive?

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23 (Pages 89 to 92)

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1 A I don't live in the car 24 hours, I don't
2 know.
3 Q Was that the only time it rolled?
4 MR. SPIRO: She just answered you, Counsel.
5 MS. GUZMAN: She did not, actually, answer my
6 specific question.
7 THE WITNESS: I don't live in the car for 24
8 hours, so I don't know.
9 BY MS. GUZMAN:
12:21 10 Q Ms. Hunter, I'm not asking whether you live
11 in the car, I'm only asking --
12 MR. SPIRO: She said "I don't know."
13 BY MS. GUZMAN:
14 Q You don't know whether December 2008 was the
15 only time the car rolled?
16 A No, I don't know.
17 Q Can you recall any other times, other than
18 December 2008, when the car rolled after you had it
19 repaired at Dagher Automotive?
12:22 20 A I can't recall. Not right now, I can't
21 recall.
22 Q When the car rolled in December 2008, did you
23 notify the dealer that time?
24 A No, I didn't notify the dealer. I don't know
25 what's wrong with it.

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1 like?
2 MR. SPIRO: I don't know.
3 MS. GUZMAN: Can we put on the record how
4 long the break is going to be so that I know when to
5 come back to this room?
6 MR. SPIRO: No. No.
7 MS. GUZMAN: You just want an indefinite
8 break?
9 MR. SPIRO: No.
12:24 10 MS. GUZMAN: About how long would you like
11 the break to be?
12 MR. SPIRO: It won't be more than 20 minutes.
13 It might be less.
14 MS. GUZMAN: Okay. We'll take a 20-minute
15 break and go off the record.
16 THE VIDEOGRAPHER: We are going off the
17 record at 12:25. This concludes media number 1.
18 And we are off the record. Thank you.
19 (Recess.)
01:20 20 THE VIDEOGRAPHER: We are back on the record
21 at 1:22.
22 This is the beginning of media number 2 in
23 the deposition of La Ronda Hunter.
24 BY MS. GUZMAN:
25 Q Ms. Hunter, when you had the parking brake

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1 Q Did you --
2 A I told you I don't know what's wrong with the
3 car. I didn't do a diagnosis on it.
4 Q Did you notify --
5 A I didn't notify anyone.
6 Q When you went to Dagher Automotive to have it
7 fixed, did you get a second opinion?
8 A No.
9 Q Has anyone ever told you what is wrong with
12:23 10 your car?
11 A Has anyone told me what was wrong with my
12 car?
13 MR. SPIRO: Don't repeat anything your
14 lawyers might have told you.
15 THE WITNESS: Somebody told me a lot of stuff
16 was wrong with my car. They told me it was dirty, so
17 what are you asking? They told me --
18 BY MS. GUZMAN:
19 Q I'll rephrase for you.
12:23 20 MR. SPIRO: Counsel. It has been an hour so
21 we should take a break.
22 MS. GUZMAN: Okay. We'll take a 10-minute
23 break. And we'll be back in 10 minutes this time.
24 MR. SPIRO: It might not be 10 minutes.
25 MS. GUZMAN: How long of a break would you

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1 system on your Yukon repaired in April of 2005, did
2 you document it in any way?
3 A No.
4 Q You didn't take any photos?
5 A No.
6 Q You didn't take a video of it?
7 A No, not that I know of.
8 Q Have you taken any pictures of your parking
9 brake system prior to having it repaired?
01:21 10 A No.
11 Q Did you contact GM before you had it
12 repaired --
13 A No.
14 Q -- so they could inspect the vehicle?
15 A No.
16 Q Did you keep the old parking brake system so
17 it could be inspected later on?
18 A No, I didn't.
19 Q Have you had your car appraised since
01:22 20 replacing the parking system?
21 A No.
22 Q Did you have your car appraised before
23 replacing the parking brake system?
24 A No.
25 Q I'm going to hand you and your counsel a copy

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24 (Pages 93 to 96)

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1 of -- a stack of photos, and it is going to be marked
2 defendants' group Exhibit Hunter 6.
3 (Deposition Exhibit 6 marked.)
4 MR. SPIRO: Wait a minute. These are not
5 numbered -- okay.
6 BY MS. GUZMAN:
7 Q Do you recognize Hunter group Exhibit 6,
8 Ms. Hunter?
9 A No, I don't.
01:23 10 Q Okay. You've never seen them before?
11 A No, I haven't.
12 Q Now I'm going to hand you and your counsel
13 specific photos from that stack. The first will be
14 marked Hunter 7.
15 (Deposition Exhibit 7 marked.)
16 BY MS. GUZMAN:
17 Q Do you recognize what's depicted in that
18 photograph, Hunter 7?
19 A No.
01:24 20 Q Do you recognize that license plate?
21 A No.
22 Q That's not your license plate?
23 A No.
24 MS. GUZMAN: Now I'm marking Hunter Exhibit
25 8.

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1 A I don't know nothing about VIN, none of that.
2 Q Do you see where in the middle of the label
3 underneath the words "manufacture shown above," there
4 are the letters -- sorry, the numbers and letters
5 1GKEC --
6 A Okay, yes.
7 Q That?
8 A Yes.
9 Q Do you recognize that as your vehicle
01:28 10 identification number?
11 A I only recognize my VIN number when I'm
12 standing right next to it and writing it down.
13 Q Do you want to refer to your response to
14 interrogatory number 1?
15 A No.
16 Q Would you, please.
17 A I really don't.
18 MR. SPIRO: Which exhibit is it?
19 MS. GUZMAN: 2, I believe.
01:28 20 THE WITNESS: Which page is that? What page
21 is that?
22 BY MS. GUZMAN:
23 Q 5.
24 A Okay.
25 Q Have you ever seen this label -- oh, sorry.

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1 (Deposition Exhibit 8 marked.)
2 BY MS. GUZMAN:
3 Q Do you recognize what's depicted in that
4 photograph, Hunter 8?
5 A A car -- two cars.
6 Q Do you recognize the car as your own?
7 A No.
8 MS. GUZMAN: And I'm handing you the last
9 picture that will be marked Hunter Exhibit 9.
01:26 10 (Deposition Exhibit 9 marked.)
11 BY MS. GUZMAN:
12 Q Do you recognize that photograph?
13 A No, I don't.
14 Q Do you know what it is a picture of?
15 A No.
16 Q Do you see in the picture where the VIN, the
17 vehicle identification number appears?
18 A No, because I don't know what I'm looking
19 for.
01:27 20 Q Do you see a vehicle identification number
21 anywhere on that picture?
22 A If it don't say VIN and then the number -- I
23 don't know because I don't know nothing about
24 vehicles.
25 Q Okay.

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1 Sorry.
2 So does the vehicle identification number in
3 your response to interrogatories match the vehicle
4 identification number in the picture I just showed
5 you?
6 A Yes.
7 Q Have you ever seen this label on your car?
8 A I can't recall. I don't know if I've ever
9 seen it before.
01:29 10 Q Do you understand what it means?
11 A No. It says, "The vehicle safety standards
12 in effect on the date of manufacture shown above."
13 Q Your answer is "No"?
14 A No, I don't know what it is. But it said --
15 GM states right here, "This vehicle" -- "applicable
16 use federal motor vehicle safety." Whatever they say
17 it is, that's what it is.
18 Q Does it mean anything to you?
19 A No.
01:30 20 Q Are you aware that there are federal safety
21 standards for cars and trucks?
22 A Yes.
23 Q Are you aware that the Federal Motor Vehicle
24 Safety Standards provide safety standards for brake
25 systems, specifically, as well?

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25 (Pages 97 to 100)

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1 A No.
2 Q Do you have any information that your 2001
3 Yukon brake system does not meet the Federal Motor
4 Vehicle Safety Standards?
5 A You asked me do I have any -- do I have any
6 information that -- no one provided me with any
7 information.
8 Q Do you have any information that your 2001
9 Yukon brake system fails to conform to any other
01:31 10 industry or governmental standards?
11 MR. SPIRO: Hold on.
12 Yeah, I'll object to that one and I'll move
13 to strike the answer to the previous one on the
14 grounds of -- on the grounds that it is asking the
15 witness to give facts or information to support a
16 contention. It is an improper deposition question.
17 THE WITNESS: I've already answered it.
18 MR. SPIRO: Yeah, you have.
19 THE WITNESS: Yeah, I answered it.
01:31 20 MR. SPIRO: Oh, yeah.
21 THE WITNESS: I did.
22 BY MS. GUZMAN:
23 Q You answered me the first question. My
24 second one was slightly different.
25 A I answered your second question too. You
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1 to purchase a car.
2 BY MS. GUZMAN:
3 Q Ms. Hunter, I'm going to hand you a copy of
4 the original complaint in this action. It is being
5 marked Hunter Exhibit 10.
6 (Deposition Exhibit 10 marked.)
7 MR. SPIRO: You handed me two, Counsel, I
8 think.
9 MS. GUZMAN: Did I?
01:33 10 THE WITNESS: Let me get some of this stuff
11 out of the way.
12 BY MS. GUZMAN:
13 Q Do you recognize Hunter Deposition
14 Exhibit 10?
15 A No. I've never seen that before.
16 Q Are you finished answering?
17 A No, I don't recognize it.
18 Q Okay. I'm handing you a second amended
19 complaint, Hunter Exhibit 11.
01:34 20 (Deposition Exhibit 11 marked.)
21 BY MS. GUZMAN:
22 Q Do you recognize Hunter Exhibit 11?
23 A Nope.
24 Q Have you looked through all the pages?
25 A I'm looking through them right now.
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1 asked me that and I said, "No," I don't understand
2 that.
3 Q I'm not asking whether you understand, I'm
4 sorry. I'm asking do you have any information that
5 your 2001 Yukon brake system failed to conform to any
6 industry or governmental standards?
7 A No, I--
8 MR. SPIRO: Also compound.
9 BY MS. GUZMAN:
01:32 10 Q I'm sorry, Ms. Hunter, you're going to have
11 to give your answer again because counsel was speaking
12 over you.
13 MR. SPIRO: I was objecting. Give me a
14 chance to object before you answer.
15 Now you can try to answer.
16 THE WITNESS: No, I don't.
17 BY MS. GUZMAN:
18 Q Since you don't know that you've ever seen
19 this label on your car, you didn't rely on it when you
01:32 20 were purchasing your car, correct?
21 MR. SPIRO: What? That makes no sense.
22 Argumentative, confusing, unfair.
23 THE WITNESS: Why would I want to rely on
24 this to purchase a car? It is a bunch of numbers and
25 alphabets. I wouldn't use alphabets and numbers just
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1 Q I'm sorry, now you've looked through all the
2 pages?
3 A Yes.
4 Q And you still don't recognize it?
5 A No. I don't recognize it.
6 Q Okay. I'm handing you a third amended
7 complaint that's being marked as Hunter Exhibit 12.
8 (Deposition Exhibit 12 marked.)
9 BY MS. GUZMAN:
01:36 10 Q Do you recognize Hunter Exhibit 12?
11 A Okay. I think it is -- no.
12 Q Okay. We're back to the fourth amended
13 complaint, which you do recognize.
14 Can you describe to me in your own words what
15 this lawsuit is about?
16 A Which one? Exhibit who?
17 Q The fourth amended complaint.
18 MR. SPIRO: Exhibit 4.
19 BY MS. GUZMAN:
01:37 20 Q You actually don't need to refer to the
21 document at all. I just asked whether you can
22 describe to me in your own words what this lawsuit is
23 about.
24 A Class action.
25 Q Can you give any more detail?
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26 (Pages 101 to 104)

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1 A Violation of consumer legal remedy act -- I
2 have no idea what it is. Violation of California
3 Unfair Competition Act, UCL. I don't know what it is.
4 Q Ms. Hunter, you don't need to explain the
5 California Legal Remedies Act or the Unfair
6 Competition law to me. I just want to know in your
7 own words what you think this lawsuit is about.
8 A It is a class action. That's my answer.
9 Q Can you give me any more detail than that?
01:38 10 A That's my answer, that's my final answer.
11 Q Can you describe what claims are being made
12 against GM?
13 A I have the slightest idea of what the claims
14 are being against. I don't know.
15 Q It was your lawyers who came up with the
16 allegations in this lawsuit, right?
17 MR. SPIRO: Vague, argumentative, asks for
18 attorney-client.
19 THE WITNESS: It's privileged.
01:39 20 BY MS. GUZMAN:
21 Q Did you come up with the allegations in this
22 lawsuit?
23 MR. SPIRO: Vague, "come up with."
24 THE WITNESS: Did I come up with this, the
25 allegations?

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1 Q What states that?
2 A I can't go back and recall -- I read it, but
3 I can't go back and recall. I read it a while back
4 ago, maybe eight -- a long time ago.
5 Q You don't know where you read it?
6 A No. I read so much.
7 Q Did you only read it in one place or more
8 than one place?
9 A I read it one place.
01:41 10 Q Did you read it before buying your vehicle?
11 A No.
12 Q Okay. Would you please refer to the first
13 set of interrogatories, Exhibit 2. And it would be
14 Exhibit A attached at the end of the interrogatories.
15 A What page are you on?
16 Q It actually doesn't have a page number. It's
17 after the interrogatories, and it is marked as
18 "Exhibit A." That's it.
19 Do you recognize Exhibit A?
01:42 20 A Yes.
21 Q Is this the document where you read that your
22 parking brake system was intended to be a life-of-the-
23 vehicle part?
24 A Yes.
25 Q Can you tell me where you read that?

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1 BY MS. GUZMAN:
2 Q Yes.
3 A No.
4 Q What do you hope to recover if you win this
5 lawsuit?
6 MR. SPIRO: Vague.
7 Go ahead.
8 THE WITNESS: My losses.
9 BY MS. GUZMAN:
01:40 10 Q Do you mean money?
11 A Yes.
12 Q Anything else?
13 A No.
14 Q What are your losses?
15 A The repairs for the brakes.
16 Q How much money is that?
17 A It was like 260 bucks. And the 33,000 that I
18 paid for the vehicle.
19 Q You state in the complaint that "GM intended
01:40 20 your parking brake system to be a life-of-the-vehicle
21 part."
22 Did anybody ever represent to you that the
23 parking brake was intended by GM to be a life-of-the-
24 vehicle part?
25 A It states that.

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1 A In the summary project wear out.
2 MR. SPIRO: I didn't hear.
3 What was that last, Madam Reporter?
4 (Record read as follows:
5 "A In the summary project
6 wear out.")
7 THE WITNESS: Summary, the projected wear
8 out.
9 BY MS. GUZMAN:
01:43 10 Q Does the summary say the "life of the
11 vehicle" anywhere?
12 A No.
13 Q When did you first see this document?
14 A I don't recall when I first seen it.
15 Q Who gave it to you?
16 MR. SPIRO: She didn't say anybody gave it to
17 her.
18 THE WITNESS: Who gave it to me? It was --
19 MR. SPIRO: In other words, assumes facts not
01:44 20 in evidence; that's my objection.
21 THE WITNESS: It is a group of papers. I
22 seen this with some other documents.
23 BY MS. GUZMAN:
24 Q Where did you get those documents?
25 A Where did I get those documents?

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27 (Pages 105 to 108)

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1 Q Where did they come from?
2 A I seen this in -- I seen this through my
3 attorney.
4 Q Do you know who created this document?
5 A No, I don't.
6 Q Do you base your statement that "GM intended
7 the parking brake system to be a life-of-the-vehicle
8 part" on anything else other than this document?
9 MR. SPIRO: Now, that one, she's not
01:44 10 answering. That violates the California law in what
11 you can ask at a deposition. In the words of the
12 court of appeal, unfair.
13 Don't answer. I instruct.
14 (Instruction not to answer.)
15 MS. GUZMAN: You're instructing your client
16 not to answer?
17 MR. SPIRO: Right, because she shouldn't have
18 to answer an unfair question. It is harassing the
19 witness.
01:45 20 BY MS. GUZMAN:
21 Q Have you seen any other documents that make
22 you think GM intended the parking brake system on your
23 Yukon to be a life-of-the-vehicle part?
24 A No.
25 Q Has anybody ever made any statements to you

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1 BY MS. GUZMAN:
2 Q Do you recognize this document?
3 A No.
4 Q Are you sure?
5 A Yes.
6 Q Did you receive a warranty booklet like it
7 when you purchased your car?
8 A I don't know.
9 Q You don't know whether you received a
01:48 10 warranty booklet when you purchased your car?
11 A I don't remember.
12 Q So you haven't read the warranty on your car?
13 A No, I haven't. I don't even remember when
14 the warranty went out.
15 Q Okay. Would you turn to the page that's
16 marked 30589 in the very bottom right corner. It
17 looks like it is page 7 of the warranty booklet.
18 A Okay.
19 Q Can you read to me the section that says
01:49 20 "Bumper-to-Bumper Coverage" out loud.
21 A "The complete vehicle is covered for three
22 years or 36,000 miles, whichever comes first, except
23 for other coverage listed hereunder, what is covered
24 and those items listed under what is not covered on
25 page 9, 10 and 11."

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1 that GM intended the parking brake vehicle -- the
2 parking brake system on your vehicle to be a life-of-
3 the-vehicle part?
4 A Have I heard anybody making a statement? No.
5 Q In other words, in case that question was
6 unclear, has anybody ever told you that GM intended
7 the parking brake system to be a life-of-the-vehicle
8 part?
9 A No.
01:46 10 Q Do you have any other reason to believe that
11 the parking brake system on your Yukon was intended by
12 GM to be a life-of-the-vehicle part?
13 MR. SPIRO: Counsel, you don't have to say a
14 question I already instructed her not to answer. So
15 don't. Same grounds.
16 (Instruction not to answer.)
17 MS. GUZMAN: You're instructing the witness
18 not to answer that question on the basis it is unfair?
19 MR. SPIRO: According to the court of appeal,
01:46 20 yes, which amounts to harassment.
21 BY MS. GUZMAN:
22 Q Ms. Hunter, I'm handing you and your counsel
23 a 2001 GM warranty booklet. It is marked Hunter
24 Exhibit 13.
25 (Deposition Exhibit 13 marked.)

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1 Q And can you read the section called "Repairs
2 Covered" out loud.
3 A "The warranty covers repairs to correct any
4 vehicle defect related to materials or workmanship
5 occurring during the warranty period. Needed repairs
6 will be performed using new or manufactured parts."
7 Q Did anybody ever make any statement, promise,
8 representation or warranty of any kind to you that's
9 not in this warranty booklet?
01:50 10 MR. SPIRO: Calls for a legal conclusion,
11 it's compound.
12 May I hear that again, or the reporter can
13 read it back.
14 (Record read as follows:
15 "Q Did anybody ever make any
16 statement, promise, representation
17 or warranty of any kind to you
18 that's not in this warranty
19 booklet?")
01:51 20 MR. SPIRO: It's also vague.
21 THE WITNESS: I said previous, I don't know.
22 I haven't -- I don't -- I don't know if I had this
23 book or not, so I don't know.
24 BY MS. GUZMAN:
25 Q Were you aware when you purchased your car

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28 (Pages 109 to 112)

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1 that it was warranted against defects?
2 A I would hope -- I hope there is a warranty
3 under defect.
4 Q Did you think that yours was?
5 A That didn't even come to mind.
6 Q I'm going to call your attention now to
7 paragraph 60 of the fourth amended complaint. That
8 happens to be on page 25 at line 18.
9 A Exhibit 4?
01:52 10 Q The fourth amended complaint.
11 MR. SPIRO: That's not what she asked.
12 MS. GUZMAN: Is that Exhibit 4?
13 MR. SPIRO: Yeah, it is.
14 BY MS. GUZMAN:
15 Q It is page 25. Do you see at line 20 where
16 it says, "In particular, GM made numerous
17 representations in its print ads and media that if a
18 defect existed in one of its vehicles, including the
19 subject vehicles, GM would repair the defect," quote,
01:53 20 "We're with you, every mile of the way. Repairs made
21 to correct any material defect," end quote.
22 Do you see that part?
23 A Line 20? Would that be in 60?
24 Q Yes, that's paragraph 60.
25 A Yeah, okay. Written materials -- okay, yes,
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1 I see it.
2 Q Can you tell me what specific print ads or
3 media you saw with this statement on it?
4 MR. SPIRO: It is vague, the question is
5 vague.
6 THE WITNESS: I just read it in the warranty
7 book.
8 BY MS. GUZMAN:
9 Q You read this statement in the warranty book?
01:54 10 A It said that it would fix the cars.
11 Q Did you see it anywhere else?
12 A I seen commercials that --
13 Q Do you remember any specific commercials you
14 saw with this statement?
15 A If I did, I can't recall right now.
16 MR. SPIRO: Vague.
17 BY MS. GUZMAN:
18 Q Would you turn to paragraph 37.
19 MR. SPIRO: What page is it, please?
01:55 20 MS. GUZMAN: I'm looking.
21 MR. SPIRO: I thought maybe you had it open.
22 I'm sorry.
23 It's 14, page 14.
24 MS. GUZMAN: Actually 15, the part of 37 that
25 I'm referring to is on 15.
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1 MR. SPIRO: All right.
2 BY MS. GUZMAN:
3 Q It will be 37, subsection (d).
4 A Okay.
5 Q Subsection (d) at about line 14, you state,
6 "Plaintiffs are informed and believe, and based on
7 that information and belief allege, that GM is engaged
8 in other acts and conduct, including attempted
9 coverups of its knowledge and activities regarding the
01:56 10 lack of effective and operable parking brakes on the
11 subject vehicles and has engaged in willful
12 suppression of that evidence."
13 On what do you base this statement?
14 MR. SPIRO: Hold on, object, misstates the
15 evidence. She, the witness, Ms. Hunter, did not state
16 it.
17 BY MS. GUZMAN:
18 Q Do you believe that GM has engaged in the
19 willful suppression of evidence?
01:56 20 A Do I believe?
21 Q Yes.
22 MR. SPIRO: It asks for a legal conclusion.
23 THE WITNESS: I don't know what to believe.
24 BY MS. GUZMAN:
25 Q Do you know what willful suppression of the
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1 evidence is?
2 A No.
3 Q Do you have any idea what this paragraph is
4 referring to?
5 A A belief.
6 Q Anything more specific than that?
7 A No.
8 Q When did you first decide to sue General
9 Motors?
01:57 10 A I think it was 2005.
11 Q Why did you decide to sue General Motors?
12 A Why did I decide to sue General Motors?
13 Q Yes.
14 A Because I had to replace my brakes and they
15 wouldn't replace them.
16 Q What gave you the idea of suing General
17 Motors?
18 MR. SPIRO: She just answered that question.
19 Asked and answered, harassing the witness,
01:58 20 argumentative.
21 THE WITNESS: You said what?
22 MS. GUZMAN: Ms. Bardsley, would you please
23 read back my question.
24 (Record read as follows:
25 "Q What gave you the idea of
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29 (Pages 113 to 116)

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1 suing General Motors?")
2 THE WITNESS: What gave me the idea? I don't
3 think it was an idea. It was based on my belief.
4 BY MS. GUZMAN:
5 Q Why did you decide to sue GM as opposed to
6 getting it repaired again?
7 A They refused to fix the parking brake when I
8 took it in. I had to pay for it myself.
9 Q So when you decided to sue GM, how did you go
01:59 10 about doing that?
11 MR. SPIRO: What? Vague.
12 THE WITNESS: When I decided to sue GM, how
13 did I go about doing it? I didn't go about -- I
14 didn't do nothing. I didn't go about nothing.
15 BY MS. GUZMAN:
16 Q Well, after you decided to sue GM, what was
17 the first thing you did?
18 A What was the first thing I did? I can't
19 recall right now.
01:59 20 Q If somebody else wanted to sue someone, what
21 would you tell them to do?
22 A That is their own prerogative.
23 Q How did you meet your attorneys in this
24 lawsuit?
25 A How did I meet them? I met Adam in Texas,
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1 Adam's law firm, when I was in Texas for a funeral,
2 and, actually, my manager, who I used to date.
3 Q I'm sorry, I just didn't hear your answer.
4 MR. SPIRO: Could you repeat it, then, Madam
5 Reporter.
6 (Record read as follows:
7 "Q How did you meet your
8 attorneys in this lawsuit?
9 "A How did I meet them? I
10 met Adam in Texas, Adam's law firm,
11 when I was in Texas for a funeral,
12 and, actually, my manager, who I
13 used to date.")
14 BY MS. GUZMAN:
15 Q Who is Adam?
16 A Adam? He's a friend of my manager.
17 Q Who is your manager?
18 A Henry Stephson.
19 Q Where was Henry your manager?
02:00 20 A At the post office.
21 Q So you met Adam through Henry at a funeral?
22 A Through mutual conversation at his house.
23 Q And Adam is a lawyer?
24 A Yes.
25 Q At what law firm?
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30 (Pages 117 to 120)

1 A I have no idea.
2 Q You don't know the name of Adam's law firm?
3 A No.
4 Q Did you approach Adam about suing GM?
5 A No.
6 Q Did he approach you?
7 A No.
8 Q How did Adam bring you to meet your attorneys
9 in this lawsuit?
02:01 10 A How did Adam bring me to meet --
11 MR. SPIRO: Adam is his (sic) attorney in the
12 lawsuit. It is vague, confusing.
13 BY MS. GUZMAN:
14 Q Is Adam your attorney now?
15 A He's involved in the lawsuit.
16 MR. SPIRO: He's the attorney of record,
17 Counsel.
18 BY MS. GUZMAN:
19 Q So did you ask Adam about suing GM?
02:02 20 A No, I didn't.
21 MR. SPIRO: Don't answer that.
22 Attorney-client.
23 (Instruction not to answer.)
24 BY MS. GUZMAN:
25 Q And you say you met him at a funeral?
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1 A No, I met him --
2 Q No, through mutual conversation?
3 A Through Henry Stephson's house and it is a
4 mutual conversation.
5 Q When did you meet him?
6 A I first met him in October of 2004.
7 Q Where did you meet him?
8 A At Henry's house.
9 Q Where is that?
02:02 10 A Texas.
11 Q What was the occasion?
12 A I said I was out there for a funeral.
13 Q Did you have any experience with Adam before
14 this lawsuit?
15 A No.
16 Q Did you consider or meet with any other
17 attorneys with respect to this lawsuit?
18 A Yes.
19 Q How many?
02:03 20 A Two.
21 Q Who were they?
22 A Matter of fact, it was three. Ira, Adam and
23 David.
24 Q Since the time that you filed this lawsuit,
25 are there any other lawyers that you have met or dealt
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1 with in connection with this lawsuit?
2 A No.
3 MR. SPIRO: Vague -- move to strike, the term
4 "dealt with."
5 BY MS. GUZMAN:
6 Q Ira, Adam and David are all attorneys of
7 record in this case; is that correct?
8 MR. SPIRO: Legal conclusion, but it is
9 correct.
02:03 10 THE WITNESS: Yes.
11 BY MS. GUZMAN:
12 Q Can you give me their last names?
13 A I don't know their last names. I know Ira's
14 last name is Spiro. Adam last name is -- it started
15 with a "V," but I don't know his exact last name.
16 Q Did you meet with any other attorneys, other
17 than Ira, Adam and David, about this case?
18 A No -- yeah, you.
19 Q Do you know what a class action is?
02:04 20 A No --
21 MR. SPIRO: Legal conclusion.
22 THE WITNESS: I just know it is a group of
23 people. That's it.
24 BY MS. GUZMAN:
25 Q Do you know that this lawsuit is a class
Page 121

1 action?
2 A Yes.
3 Q Do you know why this lawsuit was filed as a
4 class action?
5 A No.
6 Q Was it your idea to start this lawsuit?
7 A No.
8 Q Whose idea was it?
9 A I don't know.
02:04 10 Q Who first approached you about starting this
11 lawsuit?
12 A No one.
13 Q Then how did you get involved?
14 MR. SPIRO: Don't -- argumentative. It is
15 also asked and answered.
16 You can answer, if you can.
17 THE WITNESS: How did I get involved?
18 BY MS. GUZMAN:
19 Q How did you get involved?
02:05 20 A Through mutual conversation.
21 Q Whose idea was it to sue GM?
22 MR. SPIRO: You asked her that.
23 Don't answer. Counsel is harassing you.
24 (Instruction not to answer.)
25 BY MS. GUZMAN:
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1 Q Ms. Hunter, you just told me that it was not
2 your idea to start this lawsuit?
3 MR. SPIRO: She also told you she didn't know
4 whose idea it was, Counsel, you know that.
5 THE WITNESS: I can't start a lawsuit.
6 BY MS. GUZMAN:
7 Q Do you have any previous involvement in class
8 action lawsuits?
9 A No.
02:06 10 Q Have you been a party to any other lawsuit?
11 A No.
12 Q Are you involved in any other pending
13 litigation now?
14 MR. SPIRO: Vague.
15 You mean pending lawsuits?
16 MS. GUZMAN: Yes.
17 THE WITNESS: No.
18 BY MS. GUZMAN:
19 Q Have you ever given a deposition before?
02:06 20 A No.
21 Q Have you ever testified at trial before?
22 A No.
23 Q You mentioned that you're personal friends
24 with Adam. Are you friends with any of the other
25 plaintiffs' lawyers or staff?
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1 MR. SPIRO: She didn't say that.
2 THE WITNESS: I'm not personal friends with
3 Adam.
4 BY MS. GUZMAN:
5 Q Have you --
6 A I'm personal friends with Henry Stephson. I
7 don't live in Texas. Adam hangs at Henry's house, so
8 I don't know what type of relationship they had. I
9 don't know.
02:06 10 Q How would you characterize your relationship
11 with Adam?
12 A How would I characterize my relationship?
13 Q Yes.
14 A Him being a man and me being a woman.
15 Q Is he a stranger to you?
16 A Would he be a stranger to me? He would be
17 Adam, a man.
18 Q How well do you know him?
19 A I don't know him well.
02:07 20 Q Do you know him through anything other than
21 his relationship to you as your attorney in this
22 lawsuit?
23 A Do I know him -- I know of him from being
24 over at Henry's house.
25 Q So you socialized with him?
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31 (Pages 121 to 124)

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1 A That day I did.
2 Q Have you socialized with him on any other
3 occasions?
4 A No.
5 Q Have you ever been in personal communication
6 with him outside of this lawsuit?
7 A One time.
8 Q When was that?
9 A When I met him up at the office.
02:07 10 Q Can you give me a date?
11 A I don't know the exact date.
12 Q What did you say?
13 A I can't remember what I said, too long ago.
14 MR. SPIRO: Can we stop a minute?
15 THE VIDEOGRAPHER: On the sweater.
16 MS. GUZMAN: Do you want to take a break?
17 MR. SPIRO: No. The reporter -- the
18 videographer was telling me where to put my mike.
19 MS. GUZMAN: Sorry.
02:08 20 MR. SPIRO: Sorry.
21 BY MS. GUZMAN:
22 Q So you socialized with Adam one other time, -
23 but you don't remember anything you talked about?
24 A I can't recall right now.
25 Q Okay. Do you know what class notice is?

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1 potential member of any certified class.
2 A Why would I be obligated to pay?
3 Q I'm just asking if you would be willing to
4 personally pay the cost of having that done?
5 A But -- no, I don't even know what you are
6 talking about. Whatever it is, no. I don't have no
7 money to pay nobody.
8 Q Have your attorneys agreed to reimburse you
9 for the cost of class notice?
02:09 10 A No.
11 MR. SPIRO: Wait a minute, she -- I object to
12 that. It misstates the evidence. In fact, this
13 deliberately misstates the evidence, Counsel.
14 You know she just said that she's not going
15 to pay it. How can we reimburse her?
16 BY MS. GUZMAN:
17 Q Do you have understanding of what it would
18 cost to prosecute this lawsuit as a class action?
19 A No, I don't.
02:10 20 Q Are you aware that you might have to hire
21 expert witnesses?
22 MR. SPIRO: She doesn't have to hire expert
23 witnesses. Don't state it as a fact. This is going
24 to stop.
25 MS. GUZMAN: Counsel, if you have an

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1 A No, I don't.
2 Q Did you know that you might give individual
3 notice to each potential member of any certified class
4 about this lawsuit?
5 MR. SPIRO: That's false. She doesn't have
6 to do such a thing.
7 MS. GUZMAN: She can answer my question.
8 MR. SPIRO: You phrased it in terms of a
9 fact. It is not a fact.
02:09 10 THE WITNESS: I don't know how to give
11 anybody nothing. What do I have to give them?
12 MR. SPIRO: Just to be particular about
13 the --
14 THE WITNESS: What I got to give them?
15 MR. SPIRO: Hold on.
16 Objection; it is assuming facts not in
17 evidence. In fact, it is misstating the facts.
18 BY MS. GUZMAN:
02:09 19 Q Are you willing to personally pay the cost of
20 giving individual written notice to each potential
21 member of any certified class about this lawsuit?
22 A Am I willing to pay?
23 Q Yes.
24 A What am I paying? What am I paying?
25 Q The cost of giving written notice to each

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1 objection, state the objection.
2 MR. SPIRO: I have an objection and you are
3 harassing the witness and you are misstating the
4 facts, you are misstating the law, and you are asking
5 the witness to answer about misstates. I'm not going
6 to let this go on very much more, Counsel.
7 MS. GUZMAN: Please do not raise your voice
8 to me. You're doing that right now, and I find it
9 personally harassing.
02:10 10 MR. SPIRO: Well, I find it really repulsive
11 the way you're asking these questions. It's a trick,
12 it's a gimmick and it is really kind of disgusting.
13 If you want an answer of what she knows about
14 the real situations, go ahead, but don't try and trick
15 her.
16 MS. GUZMAN: Counsel, you've been doing this
17 all morning. I'm going to ask you one more time, for
18 the sake of the record, if you have an objection,
19 please state it. Don't make any speeches after that.
02:11 20 Let your witness answer the question unless you're
21 going to instruct her not to on the grounds of
22 privilege.
23 MR. SPIRO: If you start fooling around with
24 my witness like that, I will tell you so, and you're
25 doing it.

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32 (Pages 125 to 128)

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1 BY MS. GUZMAN:
2 Q Ms. Hunter, do you need me to restate the
3 question?
4 A I'm not paying -- no, I'm not, the answer is
5 no.
6 Q If you did have to hire expert witnesses,
7 would you be willing to pay that amount personally in
8 order to prosecute this lawsuit?
9 A No.
02:11 10 Q How much do you estimate you personally will
11 spend in prosecuting this lawsuit?
12 A I don't know.
13 Q Please just let me finish my question so the
14 court reporter can get it down and then give your
15 answer.
16 A Okay.
17 Q Thank you.
18 A You're welcome.
19 Q How much do you estimate you personally will
02:12 20 spend in prosecuting this lawsuit?
21 A I don't know.
22 Q How much time are you willing to spend
23 prosecuting this lawsuit?
24 MR. SPIRO: Vague.
25 THE WITNESS: I don't know.

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1 Q If you were offered all the relief that you
2 are seeking personally, would you withdraw from the
3 lawsuit?
4 A I don't know.
5 MR. SPIRO: Right. Vague.
6 BY MS. GUZMAN:
7 Q In this case if your attorneys wanted to
8 pursue a particular strategy or a course of conduct
9 with which you disagree, would you defer to them?
02:13 10 MR. SPIRO: Vague.
11 THE WITNESS: Can you repeat that again?
12 MS. GUZMAN: Ms. Bardsley, would you mind
13 reading the question back.
14 (Record read as follows:
15 "Q In this case if your
16 attorneys wanted to pursue a
17 particular strategy or a course of
18 conduct with which you disagree,
19 would you defer to them?")
02:14 20 THE WITNESS: I don't know nothing about
21 strategy and legal.
22 BY MS. GUZMAN:
23 Q Have you given the attorneys complete
24 discretion and power to make decisions affecting this
25 lawsuit?

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1 BY MS. GUZMAN:
2 Q Do know what a class representative is?
3 A Yes.
4 Q Can you tell me in your own words what is
5 your understanding of what a class representative is?
6 MR. SPIRO: Asks for a legal conclusion.
7 THE WITNESS: It represents a class of
8 people.
9 BY MS. GUZMAN:
02:12 10 Q Anything else?
11 A No.
12 Q Are you seeking to be a class representative
13 in any other lawsuit?
14 A No.
15 Q Have you ever been a class representative
16 before?
17 A No.
18 Q Would you put your own personal interests
19 ahead of the interests of the class? For instance,
02:13 20 are you willing to settle your claims personally
21 regardless of what other members of the putative class
22 may decide or desire to do?
23 MR. SPIRO: Compound.
24 THE WITNESS: No.
25 BY MS. GUZMAN:

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1 MR. SPIRO: Well, vague, asks for a legal
2 conclusion.
3 THE WITNESS: I don't know nothing about that
4 stuff you are talking about.
5 BY MS. GUZMAN:
6 Q Can you define the class for me?
7 MR. SPIRO: Vague.
8 THE WITNESS: Define -- define the class?
9 No, I can't define the class.
02:14 10 BY MS. GUZMAN:
11 Q Do you know how many people are in the class?
12 A No, I don't. I know it's a large group of
13 people. But how many as in numbers, no, I don't.
14 Q Do you also seek to represent corporations or
15 other organizations that own vehicles, like rental car
16 companies or companies with delivery vehicles?
17 A No.
18 Q Have you left the scope of the class to your
19 attorneys?
02:15 20 MR. SPIRO: Vague.
21 THE WITNESS: Yes.
22 BY MS. GUZMAN:
23 Q You do not know personally whether the
24 members of the putative class you seek to represent
25 are so numerous that joinder is impractical, right?

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33 (Pages 129 to 132)

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1 MR. SPIRO: Vague, calls for a legal
2 conclusion.
3 THE WITNESS: I don't know.
4 BY MS. GUZMAN:
5 Q What knowledge do you have that each of the
6 people in the class that you seek to represent have
7 the same claims that you do?
8 MR. SPIRO: Don't answer that. It violates
9 the California law against asking a party to state the
02:16 10 facts that support her contentions.
11 (Instruction not to answer.)
12 MS. GUZMAN: You're instructing your witness
13 not to answer?
14 MR. SPIRO: Right, because it is unfair,
15 according to our courts here and it is harassing.
16 BY MS. GUZMAN:
17 Q Ms. Hunter, you don't claim to represent
18 owners or lessees who are not at the substantial risk
19 of serious injury or death, do you?
02:16 20 MR. SPIRO: Vague, confusing.
21 THE WITNESS: I don't plan to do what?
22 BY MS. GUZMAN:
23 Q Claim to represent owners or lessees who are
24 not at a substantial risk of serious injury or death.
25 A I have no idea what you are talking about.

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1 BY MS. GUZMAN:
2 Q Do you claim to represent people who do that?
3 A Nobody in the state of California wouldn't do
4 it either. It would be a war.
5 Q So you don't claim to represent people who
6 purchased their vehicles while already knowing about
7 the alleged defect?
8 MR. SPIRO: Calls for a legal conclusion.
9 THE WITNESS: You said what?
02:18 10 BY MS. GUZMAN:
11 Q You don't claim to represent owners who
12 purchased their vehicles while already knowing about
13 the alleged defect?
14 MR. SPIRO: Calls for a legal conclusion and
15 it is vague.
16 THE WITNESS: No.
17 BY MS. GUZMAN:
18 Q Are you relying on any family member for
19 advice or counsel in this lawsuit?
02:18 20 A No.
21 Q Does anyone besides you and your attorneys
22 have control over this lawsuit?
23 A I am unaware. I don't know.
24 Q Have you had any discussions with family
25 members about this lawsuit?

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1 Q Do you know whether other drivers of vehicles
2 that you allege to be class vehicles are at a
3 substantial risk of injury in a moderate rear-end
4 collision?
5 MR. SPIRO: Vague --
6 THE WITNESS: I don't know -- I don't know
7 what you are talking about.
8 BY MS. GUZMAN:
9 Q To be clear, do you not know the answer to
02:17 10 the question or do you not understand what I'm asking?
11 A I don't have an answer for that question.
12 Q You don't know the driving habits of the
13 other members of the putative class, do you?
14 A No, I don't.
15 Q You don't know their personal circumstances,
16 do you?
17 A No, I don't.
18 Q You don't claim to represent people who
19 purchased their vehicles while already knowing about
02:17 20 the alleged defect, do you?
21 MR. SPIRO: Vague, calls for a legal
22 conclusion.
23 THE WITNESS: No, I don't -- I don't -- I
24 would hope that no one would purchase the car if they
25 know that something is wrong with it. I wouldn't.

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1 A I talked to my sister.
2 Q When?
3 A When?
4 Q When did you speak to your sister about the
5 lawsuit?
6 A This morning when I told her to drop my
7 daughter off at school because I had to come down here
8 for this.
9 Q Any other times?
02:19 10 A I can't recall.
11 Q What did you tell your sister this morning
12 about this lawsuit?
13 A To drop Sequoia off at school and I had to go
14 for a deposition for the GMC case. That's it.
15 Q Have you had any discussions with friends
16 regarding this lawsuit?
17 A No.
18 Q Who first suggested that you get involved in
19 this lawsuit?
02:19 20 A Myself.
21 MR. SPIRO: It was asked and answered, so
22 this was the third time, I believe.
23 BY MS. GUZMAN:
24 Q Do you agree that you do not personally know
25 whether there are common issues of law and fact

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34 (Pages 133 to 136)

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1 present in this litigation?
2 A I don't know law.
3 Q Do you agree that you do not personally know
4 whether your claims are typical of the claims of the
5 class you seek to represent?
6 A I don't know what "typical" means.
7 Q What does "typical" mean to you?
8 A I don't know.
9 MR. SPIRO: She just said she doesn't know
02:20 10 what it means, Counsel.
11 THE WITNESS: I don't know what "typical"
12 mean in a lawsuit.
13 BY MS. GUZMAN:
14 Q What about in common sense, what does
15 "typical" mean?
16 A Typical. Typical, that's my answer.
17 Q So you understand the word as it's commonly
18 used?
19 A Yes, commonly used, but not used in lawsuits.
02:20 20 I don't know what "typical" mean in lawsuits, so I
21 don't know.
22 Q Well, what about just in common
23 understanding, do you know personally whether your
24 claims are typical of the claims of the class you seek
25 to represent?

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1 methods for the fair and efficient adjudication of
2 this controversy?
3 A I don't know.
4 MR. SPIRO: Vague, legal conclusion.
5 MS. GUZMAN: Can we take one more quick
6 break, and I think I can do the rest of my questions
7 after that.
8 MR. SPIRO: Do you need us to leave?
9 MS. GUZMAN: I can, but is 10 minutes okay?
02:22 10 MR. SPIRO: Yes.
11 THE VIDEOGRAPHER: We are going off the
12 record at 2:23. We are off the record.
13 (Recess.)
14 THE VIDEOGRAPHER: We are back on the record
15 at 2:49.
16 BY MS. GUZMAN:
17 Q All right, Ms. Hunter, I am handing you a
18 document that's going to be marked as Hunter
19 Exhibit 14. I'm handing a copy to your counsel as
02:49 20 well.
21 (Deposition Exhibit 14 marked.)
22 BY MS. GUZMAN:
23 Q Once you've had a chance to look that over,
24 can you let me know whether you recognize it or not?
25 A Yes, I did.

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1 MR. SPIRO: Don't answer that. That is
2 harassing.
3 (Instruction not to answer.)
4 MS. GUZMAN: Can I just finish my question
5 before you both interrupt?
6 MR. SPIRO: I thought you were done.
7 BY MS. GUZMAN:
8 Q So with your common understanding --
9 MR. SPIRO: Wait a minute, are you starting a
02:21 10 new question? Are you?
11 MS. GUZMAN: I'm restating the question
12 because you interrupted me in the last one.
13 MR. SPIRO: All right.
14 BY MS. GUZMAN:
15 Q With your common understanding of what
16 "typical" usually means to you, you don't personally
17 know whether your claims are typical of the claims of
18 the class you seek to represent, right?
19 A I don't know.
02:21 20 Q Have you done any investigation to find out
21 whether others in this class you seek to represent
22 have claims that are similar to yours?
23 A No.
24 Q Do you agree that you do not personally know
25 whether a class action is superior to other available

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1 Q Can you tell me what it is?
2 A A receipt.
3 Q A receipt for what?
4 A For having my car serviced.
5 Q What is the date on the receipt?
6 A 2/22/06.
7 Q Did you bring your car in for service on that
8 day?
9 A Yes, I did.
02:50 10 Q And why did you bring your car in that day?
11 A Why did I bring it in? It needed to be
12 fixed.
13 Q What was wrong with it?
14 A It says -- what does the paper -- "customer
15 states idle is low."
16 Q Is that the only reason that you brought it
17 in?
18 A "Customer state exhaust rattles in gear."
19 Q Were those two things wrong with your vehicle
02:51 20 when you brought this?
21 A Yes.
22 Q Was there anything else wrong with your
23 vehicle?
24 A It says that, "Service department will
25 perform 27 point vehicle inspection. After inspection

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35 (Pages 137 to 140)

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1 will" -- "will pro-" -- wait a minute.
2 "Customer may chose to perform repairs or
3 reschedule."
4 Q Did you have any repairs done on your parking
5 brakes at this time?
6 A No.
7 Q Did they make any representations to you
8 about your brakes at Power Chevrolet at this time?
9 A No.
02:52 10 Q I am handing you and your counsel another
11 document previously Bates-labeled as P3020 and now
12 marked Hunter Exhibit 15.
13 (Deposition Exhibit 15 marked.)
14 THE WITNESS: Thank you.
15 MS. GUZMAN: I'm trying to find the other
16 copy, Counsel.
17 Q Ms. Hunter, when you've had a chance to look
18 it over would you let me know if you recognize this
19 document?
02:52 20 A Yes, I do.
21 Q What is it?
22 A It states it is a vehicle inspection sheet.
23 Q When did you first see this document?
24 A After I paid for my vehicle being in service.
25 Q When was that?

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1 car in that day?
2 A No.
3 Q On October 25th, 2004, did they do any work
4 on your parking brake?
5 A I don't know what they did. I don't know.
6 Q Did you ask them to do any work on your
7 parking brake?
8 A I can't recall -- no.
9 Q Was there anything wrong with your parking
02:55 10 brake when you brought your car in that day?
11 MR. SPIRO: Beyond her personal -- no, forget
12 it.
13 THE WITNESS: I don't know.
14 BY MS. GUZMAN:
15 Q And now I'm handing you another document
16 Bates labeled 3015, P3015. It is being marked as
17 Hunter Exhibit 17.
18 (Deposition Exhibit 17 marked.)
19 BY MS. GUZMAN:
02:56 20 Q Do you recognize this?
21 A Uh-huh.
22 Q What is it?
23 A It's -- ABS light again.
24 Q Is it an estimate or a receipt or an invoice?
25 A It's an estimate.

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1 A I have no idea. I'm assuming it came with
2 this. I'm assuming it came with the 2/22/06 bill.
3 Q Are you certain of that?
4 A No, I don't know.
5 Q I'm handing you another document previously
6 Bates-labeled P3014. I'll give a copy to your counsel
7 as well. It is being marked Hunter Exhibit 16.
8 (Deposition Exhibit 16 marked.)
9 BY MS. GUZMAN:
02:54 10 Q Do you recognize this document?
11 A Yes, I do.
12 Q What is it?
13 A It's a -- it looks like an estimate when I
14 pulled it in, I stated what was wrong with the car.
15 Q Have you seen it before?
16 A Yes.
17 Q When?
18 A I'm seeing it right now.
19 Q When have you seen it before now?
02:54 20 A I've seen it when -- the day when I went in.
21 Q What day was that?
22 A It was 11 -- I mean 10/25/04.
23 Q Why did you bring your car in that day?
24 A The ABS light was on.
25 Q Was there any other reason you brought your

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1 Q What's the date?
2 A I don't know. I see one date 1/5/04, I
3 think.
4 Q Is it --
5 A I don't know the date. I don't see it.
6 Q Is there also an October 25th, 2004 date on
7 there?
8 A Yeah, I see it right here.
9 Q Does this refer to the same ABS light problem
02:57 10 that Hunter Exhibit 16 did?
11 A (No audible response.)
12 Q Do you know, Ms. Hunter?
13 A Do I know what?
14 Q I'm sorry. My question was whether this
15 document refers to the same problem with the ABS light
16 that the previous document, Hunter Exhibit 16, did.
17 MR. SPIRO: Vague.
18 THE WITNESS: To be honest, I really don't
19 know, but they both have the same date, so apparently
02:58 20 they are -- they are together. They have the same
21 date on them. I don't know if the ABS light came on,
22 I took it in and they repaired it.
23 BY MS. GUZMAN:
24 Q Now I'm handing you another document Bates
25 page numbers Bates-labeled P3016 through P3018. And,

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1 actually, it should be through P3019. Sorry. There
2 is an extra page on there.
3 MS. GUZMAN: And it is being marked Hunter
4 Exhibit 17.
5 THE REPORTER: 18.
6 MS. GUZMAN: 18. Sorry.
7 (Deposition Exhibit 18 marked.)
8 BY MS. GUZMAN:
9 Q Do you recognize this document, Ms. Hunter?
02:59 10 A Yes.
11 Q What is it?
12 A An invoice.
13 Q Did you bring your car in on July 22nd, 2008?
14 A Yes.
15 Q Why did you bring your car in that day?
16 A ABS light.
17 Q Was there any other reason?
18 A No.
19 Q Does this invoice reflect any repairs to your
03:00 20 parking brake system?
21 A No.
22 Q Did you ask for any repairs to be made to
23 your parking brake system at that time?
24 A No.
25 Q Was April of 2005 the only time you asked
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1 Q When was that?
2 A I can't recall the exact day.
3 Q What about the year, do you recall the year?
4 A It was either 2004, 2005 when I met Adam at
5 the office.
6 Q Do you remember what season it was?
7 A It took me like five hours to get there. It
8 was the rainy season. It did, it took me like five
9 hours. I was stuck in traffic. It was raining. I
10 know it was raining.
11 Q Okay. What office did you meet him at?
12 A I met him at Ira Spiro's office, their
13 office.
14 Q Did you discuss a strategy for this
15 litigation at that meeting?
16 MR. SPIRO: Hold on a second. You can answer
17 that "Yes" or "No."
18 THE WITNESS: No.
19 BY MS. GUZMAN:
03:03 20 Q Did you discuss this litigation at all at
21 that meeting?
22 MR. SPIRO: Answer that "Yes" or "No." It is
23 also vague, but go ahead.
24 THE WITNESS: No.
25 BY MS. GUZMAN:
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1 G- -- you asked for repairs to be made to your parking
2 brake system?
3 A That I can recall, yes.
4 Q Ms. Hunter, do you recall what year it was
5 that you first spoke with Adam Voyles at the funeral
6 in Texas?
7 A I didn't speak to him at a funeral.
8 Q You spoke to him at Henry's house?
9 A Yes.
03:01 10 Q And that was in Texas?
11 A Yes.
12 Q And you were in Texas because of the funeral?
13 A Uh-huh -- yes.
14 Q Do you recall what year that was?
15 A It was in 2004.
16 Q Do you remember what month?
17 A I think it was October 2004.
18 Q Do you remember what part of the month?
19 A No.
03:01 20 Q After that first conversation with
21 Adam Voyles, counsel of record in this case, what was
22 your next contact with him?
23 A My next contact with Adam? It would -- it's
24 been so long ago. It was when I met him at the
25 office.
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1 Q You did not discuss this case at all at your
2 next meeting with Adam Voyles?
3 A We discussed other things.
4 MR. SPIRO: Hold on -- go ahead. Don't say
5 what it was. Go ahead. You can answer that question
6 "Yes" or "No," in other words.
7 THE WITNESS: Oh, okay.
8 Yeah, we discussed other things.
9 BY MS. GUZMAN:
03:04 10 Q Now, you mentioned that you were retired.
11 What do you rely on for income?
12 A Disability retired.
13 Q Do you have any other source of income?
14 A No.
15 Q Do you have a savings account?
16 MR. SPIRO: Just answer "Yes" or "No."
17 THE WITNESS: Yes. It's personal.
18 MR. SPIRO: That's all right.
19 BY MS. GUZMAN:
03:05 20 Q Have you ever been divorced?
21 A No.
22 Q Do you file state and federal tax returns?
23 A Yes.
24 Q Are you willing to produce them to us?
25 MR. SPIRO: No.
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1 THE WITNESS: No.
2 BY MS. GUZMAN:
3 Q Do you know what your approximate net worth
4 is?
5 MR. SPIRO: Don't answer that.
6 THE WITNESS: No.
7 BY MS. GUZMAN:
8 Q Do you know the value of your home?
9 MR. SPIRO: Don't answer that.
03:05 10 THE WITNESS: No.
11 MR. SPIRO: All right. The objection is
12 privacy, right to privacy.
13 BY MS. GUZMAN:
14 Q Are you instructing the witness not to
15 answer?
16 MR. SPIRO: She already answered.
17 BY MS. GUZMAN:
18 Q Do you know -- do you have any stocks, bonds
19 or IRAs?
03:05 20 MR. SPIRO: Don't answer.
21 MS. GUZMAN: Are you instructing her not to
22 answer?
23 MR. SPIRO: She can answer "Yes" or "No."
24 THE WITNESS: No.
25 BY MS. GUZMAN:

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1 overall?
2 A As far as the motor?
3 Q Overall, all the parts together.
4 A All the parts together, giving it a 1 out of
5 10, I give it a -- I give it a 5.
6 Q Does it take you from point A to point B?
7 A Yes.
8 Q Would you call it reliable?
9 A Yes.
03:07 10 Q Would you call it dependable?
11 A No.
12 Q Why not?
13 A Because the brakes have -- the brakes have a
14 default in them.
15 Q Has your Yukon safely transported you so far?
16 A Yes.
17 Q Have you had any other repairs made to your
18 Yukon apart from the ones that we've talked about
19 today?
03:08 20 A No, not -- no, not that I can recall.
21 Q Ms. Hunter, you said that your parking brake
22 had a defect. When did you first hear the term
23 "defect"?
24 A When did I first hear the term "defect"? I
25 don't recall, I really don't.

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1 Q Do you have any loans from anyone?
2 A No.
3 Q Have you made any loans to anyone?
4 A No.
5 Q Have you ever declared bankruptcy?
6 A No.
7 Q Do you own any GM stock?
8 A I wish back then I did. But right now, no.
9 Q Just to be clear, you've never owned GM
03:06 10 stock?
11 A I bet they made pretty good on their stocks.
12 Q But you never owned any, correct?
13 A No.
14 Q Okay.
15 A We wish we all could make money off they
16 stocks, and anybody else's.
17 Q Have you ever been audited?
18 A No.
19 Q Have you ever been sued for bad debts or
03:06 20 failure to pay debts?
21 A No.
22 Q Have you ever gotten in an accident in your
23 vehicle?
24 A No.
25 Q How would you describe your vehicle functions

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1 Q Do you recall --
2 A I know that is a word that I use all the
3 time, so it's common for me to use "defect." That's a
4 word that I use for a lot of stuff.
5 Q What did you do to prepare for your
6 deposition today?
7 MR. SPIRO: Don't answer that.
8 You can ask her if she looked at anything to
9 refresh her recollection.
03:10 10 (Instruction not to answer.)
11 BY MS. GUZMAN:
12 Q When did you prepare for your deposition
13 today?
14 A I just went over my discovery.
15 MR. SPIRO: She said when, I thought.
16 THE WITNESS: When?
17 BY MS. GUZMAN:
18 Q This time I did.
19 A We just did it today, sitting here in the
03:10 20 deposition, but I read the discovery.
21 Q Did you meet with anyone to prepare?
22 A Did I meet with anyone?
23 Q Yes.
24 A No, no.
25 Q Did you meet with your lawyers to prepare for

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1 the deposition?
2 A Yeah.
3 Q When did you meet with them to prepare for
4 the deposition?
5 A Today and --
6 (Interruption in the proceedings.)
7 MR. SPIRO: Hang on one second.
8 MS. GUZMAN: Off the record.
9 THE VIDEOGRAPHER: We are going off the
03:11 10 record at 3:12. We are off the record.
11 (Recess.)
12 THE VIDEOGRAPHER: We are back on the record
13 at 3:13.
14 MS. GUZMAN: For the record, we just went off
15 the record so counsel could answer a phone call.
16 MR. SPIRO: Thank you.
17 BY MS. GUZMAN:
18 Q Was today the only time you met with your
19 lawyers to prepare for this deposition?
03:13 20 A No.
21 Q How many times have you met with them?
22 A Once.
23 Q When was that?
24 A I can't give you the exact date. December
25 11th. I can.

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1 Q How long did you meet for?
2 A I think about an hour and 30 minutes.
3 Q Can you list everybody who was present at
4 that meeting?
5 A Me and Ira.
6 Q Is that all?
7 A Yes.
8 Q Was anyone present by phone?
9 A No.
03:14 10 Q Did you tell anyone about your preparation
11 session?
12 A No.
13 Q Were you shown any documents during that
14 deposition preparation session with counsel?
15 MR. SPIRO: Don't answer that -- well,
16 actually, you can. Go ahead.
17 THE WITNESS: Yes, I was.
18 BY MS. GUZMAN:
03:14 19 Q What documents were those?
20 A Just my discovery.
21 Q And by "discovery," you mean your responses?
22 A Yes.
23 Q Anything else?
24 A No.
25 Q What else did you do to prepare?

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1 A Sleep.
2 Q Did you talk to anyone else about the
3 deposition?
4 A No.
5 Q Ms. Hunter, have you ever had your driver's
6 license revoked?
7 A No.
8 Q Have you ever been convicted of a crime,
9 other than a minor traffic offense?
03:15 10 A No.
11 Q Are there any documents other than the ones
12 that we've talked about today that you rely on to
13 support the claims you make in the fourth amended
14 complaint?
15 MR. SPIRO: Don't answer that.
16 It violates the rule against for asking what
17 facts and documents support the contention. It's
18 unfair, according to our courts, and need not be
19 answered, according to our courts.
03:15 20 (Instruction not to answer.)
21 MS. GUZMAN: You're instructing your witness
22 not to answer?
23 MR. SPIRO: Correct.
24 MS. GUZMAN: Those are all the questions that
25 I have, but I would like to state for the record that

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1 we are leaving the deposition open as to all of the
2 questions that plaintiff's counsel improperly
3 instructed Ms. Hunter not to answer, particularly the
4 ones that were not based on privilege.
5 MR. SPIRO: So there are no -- it is not
6 being held open for anything, then.
7 THE REPORTER: Stipulation on where to send
8 the original or who is keeping the original?
9 (Discussion off the record.)
03:17 10 THE VIDEOGRAPHER: We are going off the
11 record at 3:18. This concludes media number 2 and we
12 are off the record.
13 (Discussion off the record.)
14 MR. SPIRO: I propose that the original of
15 the transcript be sent to counsel for General Motors;
16 and that the witness, Ms. Hunter, have until a certain
17 amount of days, which we'll get to in a minute, to
18 sign and make any corrections to the deposition
19 transcript and notify counsel for GM in writing of the
03:18 20 corrections. And if it's not signed and notified by
21 that period of time, then the deposition or any copy
22 of it, can be used as if it were an original; that the
23 witness can sign it under penalty of perjury as
24 opposed to before a notary. And I think that's all.
25 Let's decide on how much time.

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1 (Discussion off the record.)
2 MS. GUZMAN: We've stipulated that we will --
3 the plaintiff will have until the 31st to make
4 corrections and sign the transcript.
5 MR. SPIRO: Presuming that we get the
6 deposition on the 18th, right.
7 MS. GUZMAN: On the 18th.
8 So stipulated.
9 MR. SPIRO: Yes.
03:26 10 (Discussion off the record.)
11 MS. GUZMAN: I would just like to state for
12 the record that named plaintiff Robin Gonzales has
13 been present for the entirety of Ms. Hunter's
14 deposition today. That's all.
15 (It was agreed in the
16 deposition of Robin Gonzales that
17 the original deposition of Ms.
18 Hunter should go to Mr. Spiro for
19 obtaining signature of the witness
20 and that the original will then be
21 returned to Kirkland & Ellis.)
22 //
23 //
24
25

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth; that
6 any witnesses in the foregoing proceedings, prior to
7 testifying, were duly sworn; that a record of the
8 proceedings was made by me using machine shorthand
9 which was thereafter transcribed under my direction;
10 that the foregoing transcript is a true record of the
11 testimony given.
12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review of
15 the transcript [] was [] was not required.
16 I further certify I am neither financially
17 interested in the action nor a relative or employee of
18 any attorney or party to this action.
19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.
21
22 Dated: _____
23
24 DENISE BARDSLEY
CSR No. 11241
25

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1
2
3
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5
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7
8
9 I, LA RONDA HUNTER, do hereby declare under
10 penalty of perjury that I have read the foregoing
11 transcript; that I have made any corrections as appear
12 noted, in ink, initialed by me, or attached hereto;
13 that my testimony as contained herein, as corrected,
14 is true and correct.
15
16 EXECUTED this _____ day of _____
17 20____, at _____,
(City) (State)
18
19
20
21 LA RONDA HUNTER
22
23
24
25

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A				
ability 7:23 9:8 able 44:7 ABS 78:8 79:17 142:24 143:23 144:9,15,21 145:16 accident 150:22 accidents 34:10 account 148:15 accurate 20:15 21:11,22 22:7 25:2 25:25 26:20,24 27:3,25 83:7 accurately 83:7 achievements 47:20 act 38:13,14 105:1,3 105:5 action 103:4 104:24 105:8 121:19 122:1 122:4 123:8 127:18 138:25 159:17,18 activities 115:9 acts 115:8 ad 41:1 Adam 117:25 118:10 118:15,16,21,23 119:4,8,10,11,14,19 120:13,22 121:6,14 121:17 123:24 124:3,7,11,17 125:22 146:5,21,23 147:4 148:2 Adam's 118:1,10 119:2 address 10:9,11,19 11:12 adjudication 139:1 ads 113:17 114:2 advertisement 36:4 37:3,7,9,12 advertisements 37:4 advertising 14:20 39:6,11,25 40:5 advice 135:19 affect 9:4 58:17 affiliates 8:8 affiliation 6:18 affirmatively 54:14 afford 37:24 38:3 age 9:24 ago 83:23 107:4,4 125:13 146:24 agree 136:24 137:3	138:24 agreed 127:8 157:15 agreeing 52:19 ahead 22:1,11 23:16 45:6,21 46:4,19 56:12 60:2 61:15 63:25 69:19 70:25 90:2 106:7 128:14 130:19 147:23 148:4,5 154:16 al 6:7 alcohol 8:25 9:10 allegation 56:1 allegations 105:16 105:21,25 allege 115:7 134:2 alleged 134:20 135:7 135:13 allow 90:7 alphabets 102:25,25 amended 4:14,22,23 38:5,12,23 53:4 58:21 103:18 104:6 104:12,17 113:7,10 155:13 amount 129:7 156:17 amounts 110:20 Angeles 1:2,16 2:2 2:18 3:9,13 6:1,9 6:13,16 10:6,8,15 answer 5:15 7:21,25 8:5,13 9:1,5 13:23 15:18 16:14 17:7 17:16,17,21,23 18:1,5,9 19:10,12 19:15,20,22 21:1,2 21:16,17 23:16 25:9,20 27:2,12 28:16 32:14 41:11 41:12,13 42:21,22 43:4,8,10,12,13,18 43:19,24,25 44:3,5 44:8,17 45:6 46:3,4 46:5,6,8,24 47:1,3 47:5,7,8 48:2,3,5,7 48:18 50:16 56:3,4 56:6,10 59:6,7,9 61:9 62:3,5,7,8,16 62:25 63:14,15,17 64:19 65:14 67:25 68:3,9,17 69:7,11 69:14,16,17 70:8,9 70:16 71:22,23 72:23 73:14,15,17	73:19 74:9,11,12 75:11 83:6 86:9,11 86:13,20,24 88:1,3 88:5,7,22 89:7 90:10 91:18,21,24 93:5 100:13 101:13 102:11,14,15 105:8 105:10,10 109:13 109:14,16,18 110:14,16,18 118:3 119:21,23 122:16 122:23,24 126:7 128:5,13,20 129:4 129:15 133:8,11,13 134:9,11 137:16 138:1,3 147:16,22 148:5,16 149:5,9 149:15,20,22,23 152:7,10 153:15 154:15 155:15,20 155:22 156:3 answered 17:11,20 17:23 18:3 19:6,7 19:13 44:18 46:1,5 46:10,11,12 47:7 65:15 81:25 85:23 85:25 86:17 87:21 90:1,3 91:3,16,17 92:12 93:4 101:17 101:19,23,25 116:18,19 122:15 136:21 149:16 155:19 answering 8:21 63:4 103:16 109:10 answers 15:14,15 16:18,24 18:25,25 23:12 24:1,12 27:3 27:4,5 28:9,21,24 anybody 106:22 108:16 109:25 110:4,6 112:7,15 126:11 150:16 anytime 8:4 anyway 59:17 apart 92:11 151:18 apparently 39:17 144:19 appeal 109:12 110:19 appear 62:12 158:11 appearance 3:6 APPEARANCES 3:1 appearing 6:14 appears 23:20,22	98:17 applicable 100:15 apply 74:1 appraised 96:19,22 approach 119:4,6 approached 122:10 approximate 149:3 Approximately 11:19 April 76:3,9,21 78:5 92:21 96:1 145:25 argue 74:14 argumentative 66:21 73:13 74:2 102:22 105:17 116:20 122:14 arm 29:17,18 asked 17:11,11,20 43:8 46:10 50:2 60:20 62:15 64:20 69:13 70:6 75:10 87:14 89:7 90:10 92:9 101:5 102:1 104:21 113:11 116:19 122:15,22 136:21 145:25 146:1 asking 42:20 43:22 44:10 45:3,13 51:13 63:2 81:24 85:14 87:18 88:1 88:24,25 89:6 91:11,20 93:10,11 94:17 101:14 102:3 102:4 127:3 128:4 128:11 133:9 134:10 155:16 asks 105:17 115:22 130:6 132:1 Assistance 5:5 associate 13:8 associate's 13:9 assume 8:13 assumes 108:19 assuming 126:16 142:1,2 attached 78:25 107:14 158:12 attempted 115:8 attempting 90:4 attempts 87:3 attention 113:6 attorney 3:8,12,16 15:12 20:11,23 21:13 23:10 26:4,8	28:4 38:23 109:3 119:11,14,16 124:21 159:18 attorneys 117:23 118:8 119:8 120:17 121:6,16 127:8 131:7,16,23 132:19 135:21 attorney-client 15:13 16:20 20:25 21:15 105:18 119:22 audible 27:13 30:14 144:11 audibly 7:25 audited 150:17 authorize 21:13 authorized 3:9 26:4,8 28:4 38:23 53:11 54:8,13 55:23 56:16,22,25 57:10,11,15 auto 30:23,25 31:10 31:11 32:1,9,10,16 32:24 33:3,14 35:13 49:10,12,17 50:25 53:1 59:19 automotive 14:8,11 14:14 80:5,7,25 81:20 84:23 87:25 88:14 89:2 92:21 92:25 93:19 94:6 available 31:14 138:25 Ave 10:10 aware 15:2,5,8,21 100:20,23 112:25 127:20 awhile 83:23 a.m 2:19 6:2
				B
				B 151:6 back 30:8 31:24 32:3 49:4 52:19 60:4 69:25 70:13,23 71:2,7 83:5 86:5 91:10,18 94:23 95:5,20 104:12 107:2,3,3 112:13 116:23 131:13 139:14 150:8 153:12 backwards 43:2 bad 150:19

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